

RESOLUTION NO. 2023-20

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VERNON
APPROVING AND ADOPTING AN AMENDED GENERAL PLAN (2021-
2029 HOUSING ELEMENT UPDATE)

SECTION 1. Recitals.

- A. Every eight years, the State of California requires local governments to update their housing elements to plan for the housing needs of the local community. Cities and counties in the Los Angeles region were required to update their Housing Elements to cover the Sixth Housing Cycle from 2021-2029.
- B. Housing Elements are subject to a review and certification process by the State of California Department of Housing and Community Development (HCD).
- C. As provided in Government Code Sections 65352-65352.5, the City provided public notice of the proposed General Plan amendment to all California Native American tribes provided by the Native American Heritage Commission and other entities listed and no California Native American tribe requested consultation.
- D. In accordance with Government Code Section 65583, the 2021-2029 Housing Element Update sets forth housing policies for the City, facilitating the preservation and development of housing, establishing programs to accommodate the City's share of the regional housing need in Southern California and reflecting the zoning code changes contained in Ordinance No. 1293 adopted by the City Council of the City of Vernon on August 1, 2023.
- E. The 2021-2029 Housing Element Update was prepared in accordance with Government Code Sections 65580 through 65589 and complies with the duty to Affirmatively Further Fair Housing.
- F. The City's share of the regional housing need assessment (RHNA) in Southern California was allocated at nine (9) new housing units. The allocation establishes the number of new units needed, by income category, to accommodate regional population growth over the 2021-2029 planning period of the Housing Element.
- G. The City Council of the City of Vernon conducted a duly noticed public hearing on September 5, 2023, as required by law to review and take action on the General Plan Amendment updating the City of Vernon's General Plan to adopt the 2021-2029 Housing Element Update.
- H. In accordance with Government Code Section 65583.2, the City finds the rezoning of four (4) zoning districts in the Westside of the City accommodate new additional residential development during the period covered by the Housing Element.

I. The adoption of a Housing Element Update requires that a California Environmental Quality Act (CEQA) analysis be conducted prior to action by the City Council.

J. A Final Program Environmental Impact Report (PEIR) was prepared for the Westside Zoning Code Amendments and on July 18, 2023, the City Council of the City of Vernon adopted Resolution No. 2023-16 certifying the Final Program Environmental Impact Report (PEIR) State Clearinghouse No. 2022040458.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF VERNON AS FOLLOWS:

SECTION 2. The City Council of the City of Vernon finds and determines that the above recitals are true and correct.

SECTION 3. The City Council of the City of Vernon finds that adoption of this Housing Element Update complies with the California Environmental Quality Act (CEQA) because a Final Program Environmental Impact Report (PEIR) was prepared for the Westside Zoning Code Amendments and on July 18, 2023, the City Council adopted Resolution No. 2023-16 certifying the Final PEIR State Clearinghouse No. 2022040458.

SECTION 4. The City Council of the City of Vernon adopts the General Plan Amendment approving the 2021-2029 Housing Element Update, a copy of which is attached hereto as Exhibit A.

SECTION 5 The City Clerk shall certify the passage and adoption of this resolution and enter it into the book of original resolutions.

APPROVED AND ADOPTED September 5, 2023.

CRYSTAL LARIOS, Mayor

ATTEST:

LISA POPE, City Clerk
(seal)

APPROVED AS TO FORM:

ZAYNAH N. MOUSSA, City Attorney



City of Vernon
**Public Hearing Draft
Housing Element
2021-2019**



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Introduction

Originally a residential community, Vernon has been a primarily, almost exclusively industrial city since the 1920's. Though over the last century there has been a transition from manufacturing toward distribution, new residential was hardly developed until a new affordable development was constructed in 2015 as a part of good governance reforms. Now, in order to ensure the long-term stability and transparency of local government in Vernon, and to capitalize upon changing economic dynamics in the residential, office, retail and manufacturing markets, the City is planning its next evolution into a community which remains a center of production yet welcomes more residents into its borders in specific mixed-use areas defined within the Westside of the City.

The City of Vernon's 2021-2029 Housing Element arises in the middle of this shift, as a blueprint for how the City can enact this transformation over the next eight years in keeping with the City's General Plan and all legal requirements from the State of California.

Statutory Authority/Requirements

The Vernon Housing Element is an element of the General Plan required by State law to address current and future housing needs in the City (Government Code Section 65583). State law requires that Housing Elements address the following issues:

- Local governments must recognize their responsibility in contributing to the attainment of the State's housing goals.
- Local governments must prepare and implement housing elements that are coordinated with State and Federal efforts to provide opportunities for new housing.
- Local governments must cooperate with other agencies and governments to address regional housing needs.

The previous Housing Element covers from October 15, 2013, through October 15, 2021, and is part of the State's fifth cycle of Housing Element updates.

This 6th Cycle Housing Element sets policy from October 15, 2021, through October 15, 2029, defining how the city will meet requirements from the Regional Housing Needs Assessment (RHNA) developed by the Southern California Association of Governments (SCAG). Specifically, the RHNA calls for nine units to be added during the 2021-2029 planning period.

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The California Department of Housing and Community Development (HCD) is the State Agency responsible for ensuring that State housing law is being implemented at the local level. This includes review and approval of this Housing Element.

Relationship to Other General Plan Elements

The City of Vernon's adopted General Plan Elements include the following:

- The Land Use Element lays out the location and distribution of existing development and permitted land uses in the City.
- The Circulation and Infrastructure Element identifies the planned development of the City's transportation system and all infrastructure needs.
- The Resources Element promotes the conservation, development, and sustainable use of natural and cultural resources. It also addresses air quality, water quality and global warming.
- The Noise Element provides policy guidelines for controlling the noise environment in the City.
- The Safety Element addresses natural hazards, such as seismic events, and human-caused hazards, such as industrial fires.

State law requires that local general plans be internally consistent. As such, policies and programs in this Housing Element must be reflected in the other General Plan Elements when appropriate. For example, the Land Use Element helps implement housing policy since it determines where housing should be located and how it should look. The other elements of the General Plan directly and indirectly impact how housing develops. This includes policies for controlling noise, air quality and traffic, which affect the suitability and livability of housing.

Public Participation

California law requires local governments to incorporate public input when developing a Housing Element. Specifically, Government Code section 65583(c)(7) says "that the local government 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 program shall describe this effort."

The City of Vernon has reached out to the community to define the City's housing needs and how to address them. Given the unique makeup of Vernon's community and the vastly different efforts related to new housing and mixed-use development

on the Westside of the City and the maintenance of the City's existing housing stock, the outreach process this Element has run on two tracks:

- **Westside Stakeholders Advisory Committee.** The development of a Westside Specific Plan was closely coordinated with a Stakeholders Advisory Committee composed of City Council representatives, the Chamber of Commerce, business owners, property owners and brokers. Since the formation of this committee, the direction of the plan has changed. Instead of pursuing a Specific Plan, the City will separate the mixed-use zoning standards so they can be published immediately. The remainder of the report will be separately published as a long-range vision to guide and inspire future actions by the City and by private property owners/developers.
- In fall 2020, The Arroyo Group conducted individual interviews with eighteen potential members of the Committee. Since early 2021, when the Committee was formed, five two-hour meetings have been held. Topics of the five meetings have been:
 - Meeting #1 organized the committee and presented the baseline studies, including four areas under consideration for mixed-use development, including residential.
 - Meetings #2 and #3 established recommended goals for the project. While the primary goal was to reinvigorate Vernon's competitive advantage as a center of production, another key goal recommended by the Committee was to increase the residential population of the City. These meetings also recommended three study areas for mixed-use development: Santa Fe North, Santa Fe South, and Pacific/Hampton, and stated the Committee's opinion that housing on Santa Fe Avenue could not be undertaken without transportation and streetscape changes that would create a more suitable environment.
 - Meeting #4 involved a robust discussion of transportation changes that could be made to achieve the objective of a more suitable Santa Fe Avenue for mixed-use development.
 - Meeting #5 presented concepts for catalytic development projects, including residential projects on the Westside of the City.
 - Meeting #6 introduced proposed zoning controls and design standards for the Westside.

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- Meeting #7 involved a discussion of the development proposal at 5592-5600 S. Santa Fe Avenue. Additionally, during this meeting the change of direction for the former Westside Specific Plan was solidified. It was decided that mixed use zoning will be separated from the remainder of the report so zoning standards can be published immediately. The remainder of the report will be separately published as a long-range vision to guide and inspire future actions by the City and by private property owners/developers.

As demonstrated by the topics of discussion of the seven stakeholder meetings, stakeholder concerns about new housing have been taken into account at every step along the way, resulting in sufficient direction to prepare this Housing Element's recommendations related to new housing on the Westside of the City. Minutes from the former Westside Specific Plan Stakeholder Advisory Committee meetings are included in Appendix F.

- **Housing Commission Meeting.** City staff and The Arroyo Group conducted a meeting with the Housing Commission on December 8, 2021, to discuss the draft Housing Plan (Goals, Policies, Programs, and Sites). The Housing Commission consists of seven members (currently three business representatives, three resident representatives and one employee representative) who provide open and transparent management of the City's housing units. Minutes from the Housing Commission meeting are included in Appendix F. Key takeaways from the Housing Commission meeting included not making specific commitments about the number of housing units desired on the Civic Center site and considering traffic impacts of new housing.
- **First Public Comment Period Responses.** Public comment period on the draft Housing Element was held from January 26 to February 25, 2022. The City notified Councilmembers, Housing Commission members, residents, Vernon Village Park Apartments manager, Bell Salvation Army, Los Angeles Homeless Services Authority, Housing Rights Center, and the South Central Los Angeles Regional Center, and made the Element available on the City's website. The City received one long-form public comment, from a resident, during the public comment period. City staff and The Arroyo Group reviewed the public comment in detail and recorded responses to each subset of the public comment on an Excel sheet. The Arroyo Group, with guidance from City staff, made edits to the draft Housing Element based on the public comment received. The

edits included adding additional information and improving phrasing for ease of understanding.

- **Second Public Comment Period Responses.** The seven-day public comment period on the draft Housing Element was held from March 2 to March 13, 2023. The City notified Councilmembers, Housing Commission members, members of the Westside Specific Plan Stakeholders Advisory Committee, residents, the Chamber of Commerce, the Vernon Village Park Apartments manager, the Housing Rights Center, the South Central Regional Center, Bell Salvation Army, and the Los Angeles Homeless Services Authority, and made the Element available on the City's website. The City received one short-form public comment, from a member of the Westside Specific Plan Stakeholders Advisory Committee, during the public comment period. City staff and The Arroyo Group reviewed the public comment in detail and worked in cooperation with the committee member to edit the Element in response to the comment, prior to submission to HCD.
- **Comment Letter Response.** In response to a comment letter sent to HCD regarding CEQA streamlining and PRC 21080.1, the City clarifies that there will be no CEQA requirement for most new projects as multi-family residential projects within the Westside Mixed-Use District will not be required to go to a public body for approval.

Third Public Comment Period Responses. The seven-day public comment period on the draft Housing Element was held from May 4th to May 11th, 2023. The City notified Councilmembers, Housing Commission members, members of the Westside Specific Plan Stakeholders Advisory Committee, residents, the Chamber of Commerce, the Vernon Village Park Apartments manager, the Housing Rights Center, the South Central Regional Center, Bell Salvation Army, the Los Angeles Homeless Services Authority, and everyone who previously submitted a comment. Additionally, the City made the Element available on the City's website. The City received no responses from the public. Following HCD review of the draft Element, the City Council will conduct public hearings and adopt this Housing Element.

Goals and Policies

Although originally a residential and agricultural community, Vernon has been known over the past century as a totally industrial city. The 2010 United States Census reported a population of only 112 persons in 31 dwelling units, making it the second least populous city within the State of California.

In response to the extremely small population and the reported high salaries of public officials, Assembly Speaker John Perez introduced two measures in 2010 (AB 46 and AB781) to disincorporate the City of Vernon. The legislature agreed to hold off on disincorporation if the City would take steps to reform its government and increase and stabilize its population. The first step to increase the population was taken in 2015 with the construction of Vernon Village Park Apartments, a 45-unit affordable housing project. This resulted in a doubling of the population by 2020. But this number is still inadequate to ensure good governance and to avoid the threat of disincorporation, as manipulation of a small number of voters by an individual or entity could allow for a relatively easy takeover of control of the City.

Therefore, this 6th Cycle of the Housing Element sets forth goals and strategies to gradually increase, diversify and stabilize the population. Vernon will remain a center of production, but it will welcome more residents within its borders in specific mixed-use areas defined within the Westside of the City. This vision is illustrated by the following four goals to this 2021-2029 Housing Element:

- **Goal 1:** New, quality housing to attract and accommodate a broad, diverse and engaged citizenry.
- **Goal 2:** Attractive, livable and healthy environments for residential uses.
- **Goal 3:** Decent, safe and sanitary construction and maintenance of all housing units in the City.
- **Goal 4:** Diversity, transparency and equal housing opportunity in the ownership and occupancy of the City's housing stock.

Figure 1 presents the policies and programs that will implement these goals.

Goals and Policies

Goal	Policy	Applicable Program(s)
1. New, quality housing to attract and accommodate a broad, diverse and engaged citizenry.	Policy 1.1. Adopt mixed-use zoning within the Westside of the City which provides for the construction of new multifamily housing in suitable areas.	Program 8. Westside Mixed Use District Zoning Amendment
	Policy 1.2. Encourage the development of appropriately placed new affordable and market-rate housing through regulatory and financial incentives, when necessary.	Program 8. Westside Mixed Use District Zoning Amendment Program 13. Housing Grant Application Working Group Program 17: Review and Removal of Governmental and Nongovernmental Constraints
	Policy 1.3. Launch a marketing effort to reveal the new attitude of the City of Vernon as a community which welcomes and supports new residential development.	Program 9. Mixed Use Development Marketing
	Policy 1.4. Allow for modest increases in the density of existing housing sites.	Program 10. Medium-Density Residential Zoning Program 11. Accessory Dwelling Unit Ordinance
	Policy 1.5. Create a residential zoning district to bring existing housing units into conformance with the zoning code.	Program 10. Medium-Density Residential Zoning
	Policy 1.6. Permit the development of caretaker housing units on industrial properties when they do not provide a hazard to the health and safety of their residents.	Program 12. Caretaker Housing
2. Attractive, livable and healthy environments for residential uses.	Policy 2.1. Strategically locate housing sites and implement appropriate land use regulations for areas targeted for new housing so as to minimize noise, vibration, smoke, noxious gases, glare, heat, dust, odors, air pollution, and other adverse impacts associated with industrial uses, slaughtering and rendering uses, businesses that release toxic materials, and trucking and railroad facilities and routes.	Program 8. Westside Mixed Use District Zoning Amendment
	Policy 2.2. Encourage development of mixed-use districts which provide adequate amenities for targeted population(s).	Program 8. Westside Mixed Use District Zoning Amendment
	Policy 2.3. Explore modifications to streets, rail right-of-ways and other publicly- or utility-owned spaces adjacent to residential development which can ameliorate noise, vibration and other impacts of industrial activity and improve access to open space.	Program 21. Environmental Enhancements
	Policy 2.4. Pursue grants and funding sources to remediate contaminated potential housing sites in the City.	Program 14. Housing Grant Application Working Group

Goal	Policy	Applicable Program(s)
	Policy 2.5. Require the development of private recreation amenities within large residential projects.	Program 8. Westside Mixed Use District Zoning Amendment
3. Decent, safe and sanitary construction and maintenance of all housing units in the City.	Policy 3.1. Enforce all relevant building and zoning codes to ensure that all residential units are adequately maintained and protected.	Program 2. Code Enforcement
	Policy 3.2. Continue enforcement of environmental safety regulations to ensure that all residential units are adequately maintained and protected.	Program 6. Environmental Safety Enforcement
	Policy 3.3. Require any new residential units or those undergoing a major alteration to be equipped with air filtration systems (such as HVAC systems) and sound insulation (such as dual-paned windows) to protect residents from exposure to adverse environmental conditions.	Program 1. Maintenance of City-Owned Residences Program 8. Westside Mixed Use District Zoning Amendment
	Policy 3.4. Provide for the retention of housing units in the City that are physically and environmentally sound.	Program 1. Maintenance of City-Owned Residences Program 3. Preservation of At-Risk Housing
	Policy 3.5. Accommodate the needs of disabled residents through the adopted reasonable accommodation procedure.	Program 4. Housing Opportunities for Residents with Special Needs
4. Diversity, transparency and equal housing opportunity in the ownership and occupancy of the City's housing stock.	Policy 4.1. Prohibit discrimination and ensure transparency in the leasing and sales of housing in the City, particularly City-owned housing.	Program 7. Equal Housing Opportunity
	Policy 4.2. Ensure transparency in the selection and approval of tenants of City-owned housing.	Program 7. Equal Housing Opportunity Program 13. Housing Lottery
	Policy 4.3. Address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing and single-room occupancy units.	Program 4. Housing Opportunities for Residents with Special Needs
	Policy 4.4. Encourage the development of housing specifically for employees of Vernon businesses, while protecting against over concentrations of housing by any one business.	Program 15. Employee Workforce Housing Program 12. Caretaker Housing
	Policy 4.5. Encourage homeownership, reasonable rent increases and other measures to promote the stability of the full-time resident population.	Program 8. Westside Mixed Use District Zoning Amendment
	Policy 4.6. Preserve the affordability of existing covenanted affordable housing units in the City.	Program 3. Preservation of At-Risk Housing

	Policy 4.7. Consider options to transfer the City's housing stock to small-scale private ownership, including potential purchase by existing tenants.	Program 16. City-Owned Housing Disposition Study
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*Figure 1.
Housing Element Goals & Policies*

Quantified Objectives

Based on the needs, resources, and constraints in the City of Vernon, the following objectives represent the City’s objectives for addressing its housing challenges. The “New Construction” objective refers to the minimum number of new units that will be constructed using public and/or private sources over the 2021-2029 planning period. This corresponds to the City’s Regional Housing Needs Assessment (RHNA) assigned by the Southern California Association of Governments in 2020. While this is a minimum objective, the City hopes and expects to significantly exceed this objective during the 6th Cycle.

The “Rehabilitation” objective refers to the number of existing units expected to be rehabilitated during the 6th Cycle. The “Conservation/Preservation” objective refers to the preservation of affordable housing stock throughout the 6th Cycle planning period.

6 th Cycle Housing Element Objectives			
Income Category	New Construction (2021-2029)	Rehabilitation (2021-2029)	Conservation/ Preservation (2021-2029)
Extremely Low	2 units	2 City-owned housing units will be rehabilitated due to age.	All 45 existing covenanted affordable housing units will be preserved.
Very Low	3 units		
Low	4 units		
Moderate	0 units		
Above Moderate	0 units		
Total	9 units		

Figure 2.

Source: City of Vernon, 2021.

To implement the City's housing policies, 22 programs have been defined that will advance all the City's housing goals. As illustrated in Figure 1, these programs tie back to the goals and the policies that provide the backbone of the City's housing strategy.

An overview of each of the 22 programs is given below; detailed descriptions of each program, with action plans, are given in Appendix E.

Program 1: Maintenance of City-Owned Residences. The City owns 26 housing units in Vernon, all of which are rented. The City is responsible for the maintenance and upkeep of these units, and management is overseen by the Housing Commission. All City-owned units were determined to be in good repair. The City of Vernon recently renovated 24 of their 26 City-owned units. The remaining two units, though they are in good, habitable condition, will be renovated due to age over the next eight-year planning period. The City will continue to provide maintenance to these units, thus ensuring upkeep for Vernon's City-Owned housing stock.

Program 2: Vernon Code Enforcement Program. As additional privately-owned residential units are built in Vernon the need for code enforcement will increase. At the conclusion of the 6th Cycle, the City will review the need to dedicate additional staff time to code enforcement.

Program 3: Preservation of At-Risk Housing. There is one affordable family housing development in the City of Vernon funded through Low-Income Housing Tax Credits (LIHTC). This development, the Vernon Village Park Apartments, is not at risk of conversion to market rate housing since the development was completed in 2015. Vernon Village Park Apartments will not be eligible to convert to market rate housing until 2070.

Program 4: Housing Opportunities for Residents with Special Needs. The Fair Housing Act, as amended in 1988, requires that cities and counties 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 adopted procedures in their Zoning Ordinance for housing for persons with disabilities and will provide information to residents through the City's website.

Program 5: Priority Water and Sewer Services. In accordance with Government Code Section 65589.7, after the Vernon Housing Element is adopted by City Council, a copy will be immediately delivered to all public agencies or private entities that provide water or sewer services to properties within Vernon.

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Program 6: Environmental Safety Enforcement. The City will continue to enforce health and environmental safety regulations of industrial businesses through its Health Department which can help protect nearby residents.

Program 7: Equal Housing Opportunity Program. The City shall take meaningful actions to address significant disparities in housing needs and access to opportunity for all persons regardless of all characteristics protected by the California Fair Employment and Housing Act. Actions include publicizing information about fair housing law, referring complaints, and training property owners and managers about responsible management of environmental hazards.

Program 8: Westside Mixed Use District Zoning Amendment. The City is preparing the Westside Mixed Use District Zoning Amendment which will enable residential and mixed-use development in focused areas within the Westside of the City. Multifamily residential development of 3-7 stories in height will be permitted by-right, and infrastructure and environmental standards are envisioned to facilitate the development of housing within the targeted areas.

Program 9: Mixed Use Development Marketing. After the City of Vernon completes the Westside Mixed Use District Zoning Amendment the City will initiate a Mixed-Use Development Marketing program to inform developers and potential residents and customers of the new opportunity that will exist on the Westside of the City. This marketing program aims to market the Westside of Vernon as a hybrid industrial, mixed-use district which welcomes residential development.

Program 10: Medium Density Residential Zoning. A large amount of housing in the City of Vernon is situated on land not zoned for residential uses. This program includes adopting a zoning designation to make all existing housing conforming. The zoning designation will also permit more than one unit to be constructed per parcel, enabling future growth.

Program 11: Accessory Dwelling Unit Ordinance. The City of Vernon will develop and adopt an ADU ordinance within the sixth cycle planning period. The ADU ordinance will be in conformance with State law and encourage accessory dwelling unit construction.

Program 12: Caretaker Housing. Industrial businesses in Vernon have expressed interest in permitting caretaker housing units to be constructed on their properties. The City will adopt a code amendment to allow caretaker housing to be constructed on industrial properties in appropriate locations throughout the City, as long as such housing does not injure the health and welfare of residents or other industrial users.

Program 13: Housing Lottery. Since the institution of the City's good governance reforms in the early 2010's, the City has used a lottery system to guide the lease-up of vacant City-owned residential units. The City will continue to administer this lottery system throughout the sixth cycle period.

Program 14: Housing Grant Application Working Group. The City desires to seek out grants that can expand revenue for important housing programs while providing more financial flexibility for General Fund revenues. As opportunities arise, the City will form an interdepartmental working group to identify unmet housing needs and focus on appropriate regional grant opportunities.

Program 15: Employee Workforce Housing. The Public Works Department will inform local business owners of their ability to develop workforce housing for their employees in areas appropriately zoned for residential development. It will cooperate with business owners that seek to develop employee housing in the City, while also ensuring that such housing does not comprise an overconcentration of residents employed by any one business in the electorate of the City.

Program 16: City-Owned Housing Disposition Study. To provide long-term protection against any mismanagement of City-owned housing and provide opportunities for equity building, the City will undertake a study to consider the sale of city-owned housing units including the sale of these units to current tenants. The study would address the legal and financial constraints on such actions and provide guidelines for the appropriate prices at which units could be disposed.

Program 17: Review and Removal of Governmental and Nongovernmental Constraints. This program is an existing program that will be continued through the 2021-2029 Planning Period. This program involves the continued comprehensive review of the City's Zoning Ordinance to identify undue constraints to the production of housing. In the event a constraint is identified, the zoning requirements will be revised.

Program 18: Energy Conservation. The City will review the City's Zoning Ordinance and subdivision requirements, as well as other applicable codes, to promote energy conservation in housing rehabilitation and in the construction of new housing. This program will supplement existing City efforts in the enforcement of the State's construction codes requiring energy efficiency in new construction. This program will ensure that developers and/or architects incorporate certain State-mandated energy and water conserving equipment in new development. The City's website will be expanded to include a section that will refer users to a wide range of initiatives from other energy and water

Housing Programs

providers that will be effective in helping to conserve these resources. The programs will include rebates from other energy providers for energy conserving refrigerators, water heaters, and other household appliances.

Program 19: Extremely Low-Income, Very Low-Income, and Low-Income Housing Program. The City will pursue available funding sources to assist in the development of lower income housing, including extremely low-income housing. The City apply for State and Federal assistance including, but not limited to CDBG and HOME funding. The City will send out an annual communication to developers of affordable and special needs housing discussing available funding sources to assist in the development of lower income, including extremely low-income housing and housing suitable for special needs populations. The City will explore opportunities for adaptive reuse of existing non-residential structures into residential uses for special needs groups, including low-income households.

Program 20: Small Site Development Facilitation and Lot Consolidation. In order to facilitate the development of smaller sites within the Westside Mixed-Use District as small projects and/or encourage consolidation of smaller sites, the City will provide development incentives including flexible development standards and exploration of reusing public right-of-way. The City will also publish information on developable parcels and contact owners of contiguous sites to introduce the idea of parcel consolidation.

Program 21: Environmental Enhancements. The City will evaluate the feasibility of street improvements for streets in Vernon with residential uses. If the City finds certain improvements feasible, the City will seek eligible sources of funding. Street improvements to residential streets would improve the pedestrian experience for Vernon's residents.

Program 22: Environmental Justice. Through this program the City commits to a number of actions to address environmental concerns. The City will complete an Environmental Justice Element, coordinate with the California Department of Toxic Substances Control (DTSC) on the Exide Residential cleanup, provide residents with transit education, implement the Transportation Demand Management (TDM) standards within the Westside Mixed Use District Zoning Amendment, cooperate on the creation of the LA River Bike Path, and inform Vernon Village Park residents of City services and inform them of opportunities to become involved with municipal decision making.

APPENDIX A: HOUSING NEEDS

Demographic Trends

Understanding where the City has been vital to shaping how the City can move forward on housing policy. The City of Vernon's Housing Element takes into account trends in housing, population, jobs, and other factors that influence how the City has changed over the first two decades of the 21st Century. This Appendix provides a snapshot of where the City is and how it got here.

The City of Vernon has a very small population, as the City has historically been a center for industry. However, with the opening of an affordable housing development in 2015, the Vernon Village Park Apartments, the population in Vernon nearly doubled. Demographic information is not available on these new Vernon Village Park Apartments residents as the American Community Survey does not account for them in totality and the latest Census data is not completely available. This Housing Needs Appendix will integrate these new residents as much as possible; however, it is important to note our data sources are extremely limited for this segment of Vernon's population. Reliable data for the other portions of Vernon's population (City-owned and private, market-rate housing) are also limited because sample survey data, such as the American Community Survey, has a high margin of error for very small communities like Vernon. In certain portions of this Appendix, where possible, public data has been supplemented with recent tenant information for City-owned housing.

Population Growth

According to State of California Department of Finance data from January 2021 the City of Vernon is the 481st most populous city in the state, out of 482 total cities. The 2020 Department of Finance data identified 297 Vernon residents compared to the data from the 2020 U.S. Census, which identified 222 residents. Based Department of Finance data, over the twenty-year period from 2000 to 2020, Vernon's annual growth rate was 5.9% compared to 0.7% in the Southern California Association of Governments (SCAG) region. The 5.9% population growth rate indicates that the City of Vernon has experienced significant population growth compared to the SCAG region. This population growth is likely due to opening of the Vernon Village Park Apartments complex in 2015. According to Department of Finance data, the City's population was 123 people in 2015 and increased by 174 people for a total of 297 people in 2020.

According to SCAG's Technical Report, "Current Context: Demographics and Growth Forecast" published in September 2020, the Los Angeles County

Appendix A: Housing Needs

population is slated to increase by 16% from 2016 to 2045. The same report projects that Vernon's population will increase by 0% during the same period. However, it is the City of Vernon's vision that Vernon will become a destination for new residents in the coming years, resulting in significant population growth.

Age Characteristics

Vernon's housing needs are in part determined by the age characteristics of residents. As a person ages they cycle through different lifestyles, family sizes, and income levels. These lifestyles, family sizes, and income levels influence a person's preference for certain housing types along with their ability to afford different types of housing. Younger adults tend to move to apartments and condominiums which are typically relatively affordable and allow a great deal of flexibility. Middle-aged adults tend to move to larger apartments, condominiums, and single-family homes to fit their growing families and children. Seniors might move into more manageable living situations, such as smaller apartments/homes, properties shared with children, retirement communities, or assisted living facilities. While Vernon may not feature this wide variety of housing types at this time, the City of Vernon is committed to bringing more housing types and residential options into the City.

According to 2015-2019 ACS 5-year data (which does not factor in the new Vernon Village Park Apartments population), the median age of a Vernon resident is 26.5 years old, which is significantly lower than the Los Angeles County median age of 36.5 years old. According to the same data, 40.8% of Vernon's population is male and 59.2% of the population is female.

According to 2015-2019 ACS 5-year data, the percentage of the total population 19 years old and younger is 40%, which is much higher than the county share at 24.6%. Vernon's seniors make up 3.8% of the total population, which is lower than the county share at 13.3%. The same data finds that the four largest segments of Vernon's current population 25 to 34 years old, 35 to 44 years old, 5 to 9 years old, and under 5 years old, respectively. These trends indicate that residents in Vernon typically raise their families in the City, but likely move out of the City as they age. The City of Vernon's median age actually decreased as according to 2006-2010 ACS Data, the median age was 30.4 years old.

Appendix A: Housing Needs

Race and Ethnicity

Over the last decade, from 2010 to 2019, the city has experienced significant increases in population. According to 2020 U.S. Census Data, which counted a population of 222 residents, for those residents who identified as one race 97 residents identified as some other race alone, 53 residents identified as White alone, 20 residents identified as Black, 15 identified as Asian alone, and 3 identified as American Indian. Unfortunately, there is no other information available for those 97 residents who identified as some other race alone, which makes up a large segment of Vernon's population at 43.7%. Additionally, 34 residents identified with two or more races. Of the 222 residents, 168 residents identified as Hispanic or Latino.

A comparison of U.S. Census Data from 2010 and 2020 found that over the past decade the White population in Vernon decreased while the population of every other race increased, especially the Latino population which increased from 48 people in 2010 to 168 people in 2020.

Foreign Born Population

According to 2015-2019 ACS 5-year data, 24 residents are foreign-born in Vernon. Of this foreign-born population, 9 residents are naturalized U.S. citizens. Eighteen of these 24 residents were born in Latin America. The population in Vernon that speaks English only at home is 26.5% of the population. Seventy-three percent of the population speaks a language other than English at home and 12.4% of that population speaks English less than "very well." For residents who speak a language other than English, the most prevalent language is Spanish which is spoken by 65.5% of the population 5 years old and up.

Employment Growth and Change

Employment trends have an important role in defining housing needs. Employment factors that impact housing needs include projected job growth that will bring more residents into the city, wage levels in the city, and demands on infrastructure that result from increased housing and employment demand. The City of Vernon has long been a city for industry. The City hopes to bring more housing to Vernon, allowing more of Vernon's workers to live locally in the City.

Based on 2015-2019 ACS 5-year data, the City of Vernon has 58 workers living within its borders. These workers work across 9 major industrial sectors, with the three most prevalent sectors being Public Administration, Education & Social Services, and Retail Trade.

Appendix A: Housing Needs

As for employment by occupation, the largest occupation among residents is management, followed by sales, and production respectively. The number of employees working in management, business, science and arts has increased most significantly over the past ten years in Vernon.

According to the U.S. Census Bureau “On the Map” data from 2021, there are 38,767 jobs in the City of Vernon. The number of jobs available in 2010 was 44,534, meaning the number of jobs in the City of Vernon has decreased over the past decade. This may be due to a shift from manufacturing to warehousing, which requires less workers.

According to 2015-2019 ACS Data, the City of Vernon’s unemployment rate was 0%. The unemployment rate likely increased during the COVID-19 pandemic; however, it is expected that the unemployment rate has recovered as of November 2021.

According to the U.S. Census Bureau “On the Map” data the number of residents who lived and worked in Vernon decreased from 99 people in 2010 to 88 people in 2019. As of 2019, 38,679 people worked in Vernon but lived outside of the city and 245 people lived in Vernon but worked outside of the city.

Household Income

Household income predicts the types and price of housing that residents can afford. According to ACS 2015-2019 5-year data, the City of Vernon’s median household income increased significantly by \$29,292 over the last decade to \$67,917. This significant increase can likely be attributed to the small sample size in Vernon. Using the same data, Vernon’s median household income closely matches the Los Angeles County median household income of \$68,044. There is no ACS Poverty Data available from recent years for the City of Vernon.

Housing Composition

According to January 2021 California Department of Finance data, there are 76 housing units in the City of Vernon (which differs from the City’s data which finds 74 housing units in the City), which does account for the Vernon Village Park Apartments. The city’s housing stock is approximately 69.7% multi-family (5 units or more). Single-family detached homes, at 23 units, make up 30.3% of the city’s housing stock. Compared to the SCAG region, Vernon’s share of single-family detached housing is significantly lower than the regional SCAG average, while the share of multi-family housing is higher than the regional SCAG average.

Additionally, according to the same data the City of Vernon has an overall vacancy rate of 2.6% which is lower than the Los Angeles County overall

Appendix A: Housing Needs

vacancy rate of 6.4%. A healthy residential vacancy rate in the United States hovers around 7 to 8%. Very little vacant housing exists in the City of Vernon at this time.

According to 2015 to 2019 ACS data the City of Vernon's average household size is 4 people per owner-occupied household and 2.92 people per renter-occupied household. The average household size in Los Angeles County is 2.92 people per household.

Housing Tenure

Housing tenure refers to whether a household rents or owns a home. According to 2015-2019 ACS Data, there are four owner-occupied units in the City. The City's homeownership rate of 9.3% does not correspond with the City's proportion of single-family housing, because the City of Vernon owns many of the single-family homes in the City and rent them to residents. Owner-occupied units in Vernon exist at much lower rates than in Los Angeles County, which has 45.8%.

According to 2014-2018 ACS 5-year Data, the majority of owner-occupied households moved into their homes since 2014. Renter-occupied households also moved into Vernon quite recently with the majority moving in during that same time period.

Housing Age and Condition

According to 2014 to 2018 ACS 5-Year Data, the City of Vernon's housing stock was consistently built slowly over the years, spreading from prior to 1939 to 2009. In 2015, the Vernon Village Park Apartments were built.

Residential units begin to show their age after 30 years and require exterior maintenance and upkeep. In addition to exterior upkeep and maintenance, homes that are older than 30-year-old are likely to need substantial repairs, maintenance, and renovation internally. The City of Vernon has recently updated all but two of their City-owned housing stock and the City has plans to renovate the last two over the next eight-year planning cycle. The private units in the City are in good quality as are the Vernon Village Park Apartments which were built only six years ago.

Based on 2015-2019 ACS Data, the majority of the housing stock in Vernon does not have issues with substandard quality. No units in Vernon lack plumbing or kitchen facilities and only three units have no telephone service available.

Housing Prices and Affordability

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HUD CHAS 2013-2017 data reveals that sixteen households in the City are cost burdened, all of whom are renters. Four households, all of whom make between 30% and 50% HAMFI, are severely cost burdened, indicating that they pay over half of their income in rent.

The City of Vernon owns 26 of the City's 74 residential units. As a stipulation of the City's good governance reforms, new renters of City-owned housing pay market-rate rents according to the Small Area Fair Market Rents established by HUD for the Vernon zip codes, which are 90023, 90058, 90255, and 90270. The 2020 small area fair market rents for these four zip codes are as follows: \$1,450 for a one-bedroom unit, \$1,860 for a two-bedroom unit, \$2,470 for a three-bedroom unit, and \$2,690 for a four-bedroom unit.

The City is currently increasing the rent each year for already rented City-owned units. The City increases the rent on these units every year according to the Consumer Price Index (CPI), which is the measure of inflation. As of October 2020, these are the average rents the City charges for City-owned apartments: \$1,057.45 for two-bedroom apartments and \$964.53 for one-bedroom apartments. According to the same data, these are the average rents the City charges for City-owned single-family homes: \$1,031.36 for two-bedroom homes and \$1,361.75 for three-bedroom homes.

Additionally, the Vernon Village Park Apartments are rented at affordable rates and the residents qualify through their income, meaning these residents are not rent burdened.

Homeownership

The housing market from 2000 to 2010 was incredibly volatile, especially during the 2008 financial crisis. The City of Vernon has been largely exempt from this volatile market, as the City has so few units available for homeownership. In fact, there is very little data available regarding the price of homeownership in Vernon that can be used for an accurate estimation.

While homes in Vernon likely cost significantly less than homes in the larger SCAG region, Vernon's few homeowners are paying high amounts in mortgage costs per month. Additionally, the maintenance and upkeep costs that come along with owning older homes place financial pressure on the homeowner or property owner. These maintenance and upkeep costs add up on top of the already high mortgage costs for owners in the City of Vernon.

Extremely Low-Income Housing Needs

Appendix A: Housing Needs

In 2013-2017, according to HUD CHAS data, the City of Vernon had no households that qualified as extremely low-income households, or households that earn below 30% of the HAMFI. In the absence of poverty data, this is the most accurate estimation for the number of extremely low-income households in Vernon. Due to the absence of Census data on extremely low-income households in Vernon, it is presumed that 50% of the regional housing needs allocation for very-low-income households qualify as extremely low-income households. This means that there are 2.5 extremely low households in the City of Vernon, which is the City's projected extremely low-income housing need.

The number of extremely low-income households in Vernon may have increased recently due to the opening of the Vernon Village Park Apartments. However, the extremely low-income households living in this project are not rent burdened and are living in affordable housing that is sustainable in the long-term. These households are not susceptible to the volatile private market in Southern California.

Special Needs Populations

Certain households in Vernon have greater difficulty finding safe and decent affordable housing due to special circumstances. These special circumstances typically relate to age related health issues, family characteristics, income-earning potential, physical or mental disabilities, homelessness and more. Circumstances such as these make it difficult to secure and maintain affordable housing in Vernon. Often these households have higher rates of overpayment and overcrowding due to their special circumstances. Because of these considerations, the housing needs of special needs populations such as these are considered separate from the general population's housing needs.

State housing law defines "special needs" populations as people with physical and mental disabilities, farmworkers, large families, female headed households, seniors, and people experiencing homelessness. This section will address the housing needs of each of these special need populations.

Disabled

According to Section 4512 of the Welfare and Institutions Code, a 'Developmental disability' is a disability that originates before an individual is eighteen (18) years old, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. Developmental disabilities include intellectual disabilities, cerebral palsy, epilepsy, and autism. This term also includes other disabling conditions that are closely related to intellectual disabilities or requires treatment similar to that for intellectual disabilities but does not include other disabling conditions that are purely physical in nature.

Appendix A: Housing Needs

According to 2015-2019 ACS 5-year Data, 11 Vernon residents have a disability. Vernon's disabled population accounts for 8.5% of the total civilian non-institutionalized population. Nine of the eleven disabled residents are 18-64 years old while the remaining two disabled residents are 65 years old or older. Based on 2014-2018 ACS 5-Year Data, the top three types of disabilities are ambulatory, independent living, and cognitive, respectively. The top three most common types of disabilities for seniors in Vernon are ambulatory and self-care respectively.

Based on 2021 data from the California Department of Developmental Services there are approximately 52 individuals with developmental disabilities in the 90058 zip code, 32 of which are under 17 years of age and 20 of which are adults. The 90058 zip code does encompass the majority of the City of Vernon, however, the zip code also covers residential areas outside of Vernon, in the City of Los Angeles. These residential units outside of Vernon in the 90058 zip code are likely resulting in an overcount for the number of developmentally disabled individuals in Vernon. The Pueblo del Rio public housing development accounts for some of the residences included in the 90058 zip code, that are not within the City of Vernon. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. There is a large discrepancy with the ACS data which found 11 Vernon residents with disabilities.

Additionally, people with disabilities may have a harder time finding and keeping employment opportunities. Two of eleven disabled Vernon residents are employed. This lack of employment among the disabled population means that Vernon's disabled residents are largely receiving governmental or familial support and are on a fixed income.

Appendix A: Housing Needs

Farmworkers

Farmworkers are a particular concern in California due to their limited income and often unstable nature of their employment. Vernon is a fully developed, urbanized community in the midst of a major metropolitan area; the nearest agricultural lands are at least fifty miles away. According to 2014-2018 ACS 5-Year data there are no farmworkers living in Vernon.

Large Family

According to 2015-2019 ACS 5-year data, the average household size in the City of Vernon is 3.02 people. Compared to the same data for Los Angeles County, the average household size is fairly similar at 2.99 people per household. The same data for Vernon found that the majority of units feature one occupant per room. No household in Vernon experiences overcrowding. According to HCD's definition, large family is often thought of as households with five or more people. No household in Vernon features five or more people. The most prevalent household sizes in Vernon are one and two person households.

According to 2015-2019 ACS 5-year data, two-bedroom units represent the highest share of the housing stock (29 units), three-bedroom units are the second highest share (11 units), and one-bedroom units are the third highest share (4 units). There are no four- or five-bedroom units in the City of Vernon. This ACS data undercounts the number of units in the City of Vernon. This is likely due to the recent development of the Vernon Village Park Apartments which accounts for 45 of the City's 76 housing units. The Vernon Village Park Apartments includes three-bedroom units for large families, as well as one- and two-bedroom units.

Female Headed Household

Female-headed households have special housing needs and may have more difficulty finding decent and affordable housing. Limited incomes and time dedicated to both employment and family responsibilities create a special need for low-cost and low-maintenance housing for all female-headed households. Female-headed households with children can have particularly acute housing difficulties as women generally earn lower incomes than men. A lower income combined with the cost of childcare often leaves little remaining income for housing costs. Therefore, addressing the housing needs of female-headed households is important.

According to 2015-2019 ACS 5-Year data, there are 21 female headed households in Vernon. This means that approximately 48.8% of households in Vernon are female headed households. Eleven of these 21 households feature children under the age of 18.

There is no poverty data available for the City of Vernon, therefore it is unknown how many of these female headed households live under the poverty line. However, it is likely that female headed households in Vernon experience poverty at higher rates than other populations in Vernon and are in need of affordable housing that is large enough to house their family. Female headed households have the exact same costs as other families; however, they typically only have the support of one parent's income. The costs of childcare alone can almost fully deplete one parent's salary, leaving little room for other essentials such as social service needs, recreation programs, food, clothing, health care, housing, and more.

Seniors

Seniors are defined as residents who are 65 years or older. Persons over the age of 65 are considered a special needs group due to four main concerns:

- Income: persons over 65 are more likely to be retired and living on a fixed income.
- Health Care: elderly persons have a higher rate of illness, making health care more important.
- Transportation: many elderly persons use public transportation; and
- Isolation: many elderly persons are isolated from family members, friends, and services.

Seniors will constitute an ever-increasing proportion of this nation's population in future years according to demographers.

According to the City's information from 2021 regarding the demographics of residents in their City-owned housing, there are 12 residents who are 65 years or older. Five of these 12 residents live alone. Unfortunately, data is not available regarding residents of the Vernon Village Park Apartments, therefore, it is unknown how many more seniors reside in Vernon at this time.

While some of Vernon's seniors may live on fixed or low incomes, the City rents the City-owned housing to these seniors at affordable rates that are within their ability to afford.

Appendix A: Housing Needs

Homeless

The City of Vernon is located within Service Planning Area (SPA) 7, a geographic region within the County of Los Angeles which allows the Department of Public Health to develop and provide targeted public health, clinical, and mental health services to the residents of each SPA. SPA 7 includes Vernon and surrounding cities such as Bell, Commerce, Downey, South Gate, and more. The City of Vernon was included in the SPA 7 homeless count that was undertaken in 2020 by the Los Angeles Homeless Services Authority (LAHSA). This 2020 survey for SPA 7 identified 955 homeless persons living in shelters and 3,631 unsheltered homeless persons for a total of 4,586 homeless persons.

According to the LAHSA 2022 Homeless Count, there are 9 homeless people living in the City of Vernon. Of this total, all 9 homeless individuals are unsheltered. Five individuals are unsheltered on the street, 1 individual is unsheltered in a tent, and 3 individuals are unsheltered in cars or vans.

In accordance with State law, this Housing Element targets the Santa Fe North zone for the development of emergency shelters to address the homeless population in Vernon. The opportunities that exist within this zone to develop emergency shelters far exceed the actual homeless population in Vernon. Additionally, a large number of facilities for homeless individuals and families are located within a five-mile radius of the City. For example, the Salvation Army Shelter in the city of Bell is a regional emergency shelter offering emergency and transitional housing for up to 500 homeless adults. In addition to a place to stay, the Bell Shelter provides case management; substance abuse rehabilitation; individual and group therapy/counseling; on-site health care, medical referrals and HIV/AIDS education; job training; on-site adult education classes and life skills classes.

Single Room Occupancy

Housing types that may accommodate the needs of extremely low-income households include transitional and supportive housing, single room occupancy units (SRO's), multi-family rental housing, factory-built housing, workforce housing and mobile homes.

The City of Vernon does not presently permit SROs. The Westside Mixed Use District Zoning Amendment (Program #8) will allow such units to be established in residential mixed-use districts along Santa Fe Avenue, which is where the greatest number of these buildings exist in Vernon.

Assisted housing units at risk of conversion in next 10 years

The only assisted housing units within the City are the 45 units that belong to the Vernon Village Park Apartments. This affordable complex opened in 2015 and will not be at risk of conversion within the next 10 years, as these units are covenanted until 2070.

Projected Need (RHNA)

The Regional Housing Needs Allocation (RHNA) is mandated by State Housing Element law. The RHNA process determines the amount of housing growth each county and city must plan for in the 2021-2019 sixth cycle Housing Element. The RHNA process ensures that each jurisdiction accepts its fair share of future housing needs, not only in the City but in the region. The regional housing needs are the number of units that must be built in each jurisdiction to accommodate for the forecasted population growth over the next eight years.

The RHNA process is managed by the California Department of Housing and Community Development (HCD) which determines the projected statewide housing need and growth over the next eight years. These growth projections are passed down to regional councils of government, such as the Southern California Association of Governments (SCAG) in Vernon's case. SCAG develops an allocation methodology which determines each city's RHNA number, broken down across four income levels.

HCD allocated 1.34 million new housing units to the SCAG region, the largest allocation the region has ever received. Due to the City of Vernon's industrial character, the City's allocation remains small, at nine units spread across four income levels. This allocation means that the City of Vernon must plan for a minimum of nine new units over the next eight years; however, it does not mean that the City must ensure the construction of these new units.

Appendix A: Housing Needs

6th Cycle Regional Housing Needs Allocation for Vernon	
Income Level	Units
Very-Low Income (<50% of AMI)	5
Low Income (50-80% of AMI)	4
Moderate Income (80-120% of AMI)	0
Above Moderate Income (>120% of AMI)	0
Total	9

Figure A-1.

Source: Southern California Association of Governments.

Due to the absence of Census data on extremely low-income households in Vernon, it is presumed that 50% of the regional housing needs allocation for very-low-income households qualify as extremely low-income households. This means that the City's projected extremely low-income housing need is three units.

Appendix B: Constraints to Future Housing Development

Constraints to Future Housing Development

Meeting the housing needs for the City over the next eight years and beyond is not simple given the built-out nature of Vernon and the surrounding region. This Appendix identifies constraints to developing new housing, pursuant to the State Government Code Section 65583(a). Constraints are classified into two categories: a) governmental constraints, over which the City of Vernon has significant authority, and b) non-governmental constraints, which are more difficult for the City to address.

The governmental constraints addressed in this appendix are:

- Existing zoning and land use controls
- Site plan review and processing times
- Off-site improvements
- Processing fees

The non-governmental constraints addressed are:

- Land availability and cost
- Housing prices
- Construction costs
- Financing
- Environmental conditions

The appendix then concludes with an in-depth examination of environmental constraints. The analysis developed below directly informs the housing programs recommended in this Housing Element.

Historically, housing growth has been virtually nonexistent in Vernon due to City policy that has discouraged, and in 2007 precluded, the development of any new residential units. For many years, due to Vernon's industrial nature, City policymakers determined that housing would not be a compatible land use in the City. However, as part of the City's good governance reform initiative, City leaders have agreed to establish a way to allow for a very limited amount of new housing. Today, Vernon is making a major shift towards the development of new housing in the City with the Westside Mixed Use District Zoning Amendment.

Appendix B: Constraints to Future Housing Development

The City's new prioritization of housing will result in the removal of most of the major governmental constraints to housing development.

Existing Zoning and Land Use Controls

The Vernon Zoning Code and Zoning Map are the primary implementation ordinances of the Land Use Element. The zoning map and ordinance identify the specific land uses allowed in the City and establishes regulations and standards for use and development. The entirety of Vernon is zoned industrial, but seven overlay zones provide additional flexibility: Commercial-1, Commercial-2, Emergency Shelter, Housing, Rendering, Slaughtering, and Truck and Freight Terminal overlay zone.

The only zone which allows residential uses is the Housing Overlay which is currently restricted to a small rectangular area in the Southeast corner of the City. Residential uses (including single-family, multi-family, supportive, transitional, and more) are permitted within the Housing Overlay zone; however, a development agreement is required as no residential uses are permitted by-right in the City. The purpose of the Housing Overlay is to accommodate housing at limited and specific areas of the City pursuant to General Plan policy, and to locate such housing in a manner that minimizes potential conflicts between residential and industrial uses.

Development standards and site planning standards are determined during the process of a project obtaining a development agreement. As part of the development agreement, the City may impose requirements that protect occupants from environmental contaminants and risk factors, such as traffic, air pollutants, noise, odor, dust, and more. While there are no standardized development standards or site planning standards, the recent Vernon Village Park Apartments project can be analyzed as a typical development in the City of Vernon. The Vernon Village Apartment consists of 45 affordable rental units. The 45 units create an apartment community, consisting of multiple separate two-story structures surrounding two courtyards, instead of one single structure. The two parking lots for the complex are set on either side of the development, consisting of no structured or underground parking. The entire site, including both parking lots, is about 2 acres. The density of the project is approximately 22 dwelling units per acre. The development features 75 surface parking spaces which is about 1.6 parking spaces per unit for a complex that features 1-, 2-, and 3-bedroom units. Additionally, according to Vernon Municipal Code Section 17.56.060, parking requirements for residential uses are determined pursuant to a Development Agreement. However, no less than one parking space must be provided per unit. For new building construction, 6% of required parking spaces, rounded up to the nearest whole number, shall be equipped with a Level 2 or higher EV charger.

Appendix B: Constraints to Future Housing Development

Of note, the majority of residential units currently existing in the City are not covered by the Housing Overlay, but instead are zoned industrial. Program 10 of this Element describes the City's intention to change the zoning of parcels with residential units from industrial to residential within the 6th cycle planning period. The Westside Mixed Use District Zoning Amendment, Program 8 of the Element, describes the ways in which more areas in Vernon will be rezoned to permit residential uses. Both programs will establish by-right processes for the development of housing.

The City's land use controls for residential development do impact timing, supply, and the certainty that developers have in the approval of their projects. The current land controls were established with the intention of securing only industrial development in the City of Vernon. The Westside Mixed Use District Zoning Amendment proposes by-right residential development in well suited areas, greatly reducing the constraints caused by the City's current land use controls for residential development.

Westside Mixed Use District Zoning Amendment

The City is currently in the midst of preparing a Mixed-Use District Zoning Amendment for the Westside of the City. This Zoning Amendment has three goals:

- Increase the residential population in order to increase access to proportionally allocated Federal and State funding, to strengthen the City's governance by providing more voters and candidates for elected office, and to help meet regional housing needs.
- Diversify and reorient the Westside's land uses to take advantage of changes in the economic landscape of Southern California.
- Increase amenities available to local residents and workers.

In order to pursue these three goals, the Zoning Amendment will strongly encourage the development of new construction and adaptive reuse residential projects within defined areas within the boundary. The proposed boundaries of new zoning districts are shown in Figure B-1. While not infringing upon current and future uses presently allowed, development standards and procedures will allow additionally allow multifamily residential development of 3-7 stories by right, in areas of typified by smaller properties that are not economically suitable for new logistics uses which would be the greatest competition to residential from a land cost perspective. The Zoning Amendment will develop four new mixed-use zones along Santa Fe Avenue, the Mixed Use – City Center (MU - CC) zone, the Mixed Use – Santa Fe South (MU - S) zone, the Mixed-Use - Santa Fe North (MU-N) zone, and the Mixed Use – Pacific Hampton (MU -

Appendix B: Constraints to Future Housing Development

PH) zone. Three of these four new mixed-use zones (excluding the MU-PH zone) will permit multifamily housing and will set development standards for new multifamily housing within the zones.

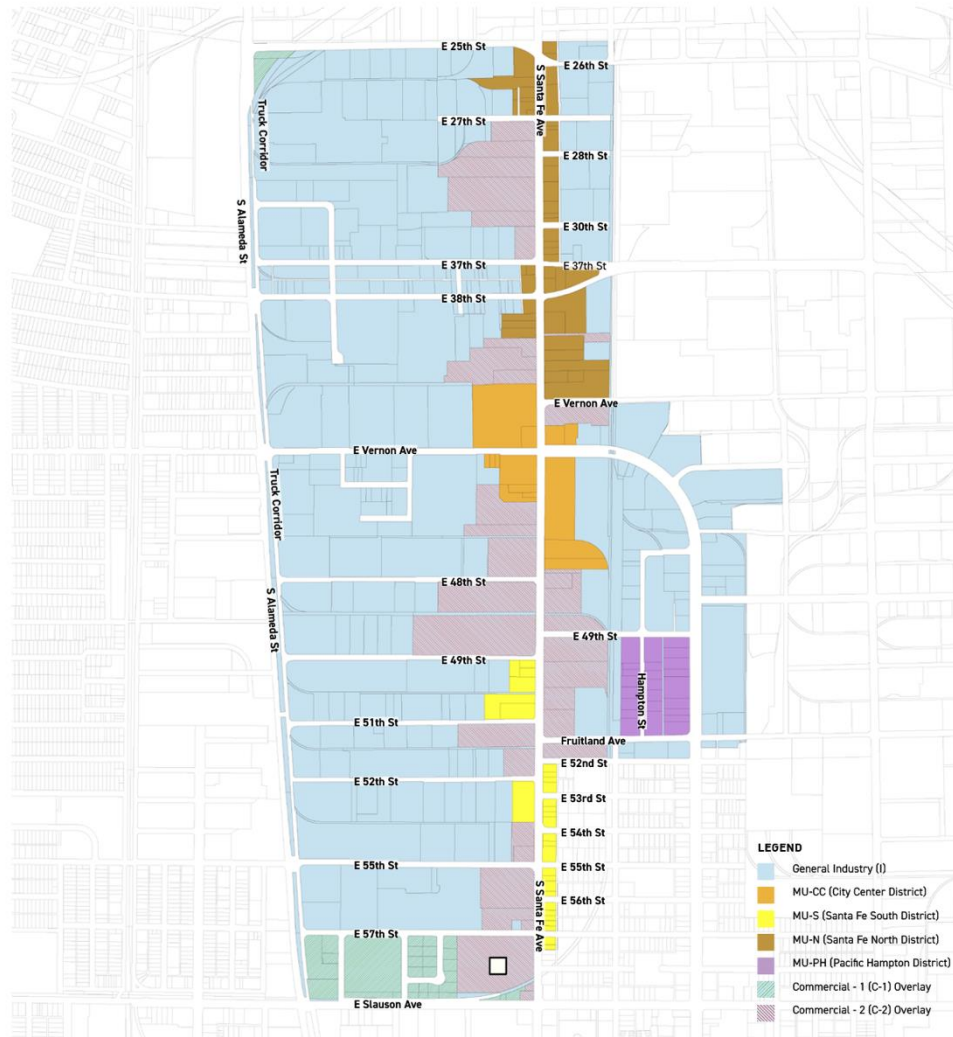


Figure B-1.

These mixed-use zones are intended to accommodate and facilitate development of mixed-use projects, with residential, of at least 50 dwelling units per acre. Currently proposed zoning standards allow heights of five to unlimited stories, depending on the zoning district, with a required step-down to three to four stories height along Santa Fe Avenue (with the exception of projects which preserve a legacy industrial structure, which qualify for additional incentives, and projects on small sites which may be granted incentives subject to Program 20 (Small Site Development Facilitation and Lot Consolidation)). There is no direct density or FAR limit.

Appendix B: Constraints to Future Housing Development

Figure B-2 shows the primary proposed development standard controls for the Mixed Use – Santa Fe South (MU-S) zone, the most restrictive residential zone proposed. A prototypical development built up to the maximum 3-5 story heights on the demonstrated 0.46-acre site would generate 49 units at an average of 1,150 sf GBA/unit. This translates to a density of 106 dwelling units per acre. Retail and live/work uses would be located on the ground floor, and parking (55 spaces) would be located on the ground level and in one half of one subterranean level.

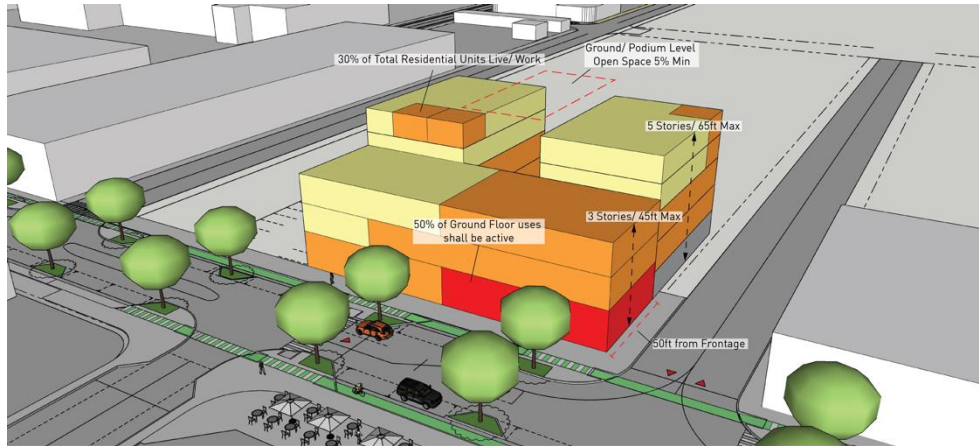


Figure B-2.

A second development test illustrating development possibilities without subterranean parking shows a three-story development with more abundant open space; with 30 parking spaces, the development can accommodate 24 residential units (52 dwelling units per acre) and approximately 3,500 square feet of ground-floor retail space. Therefore, we are confident that new construction development can be built at a minimum density of 50 dwelling units per acre.

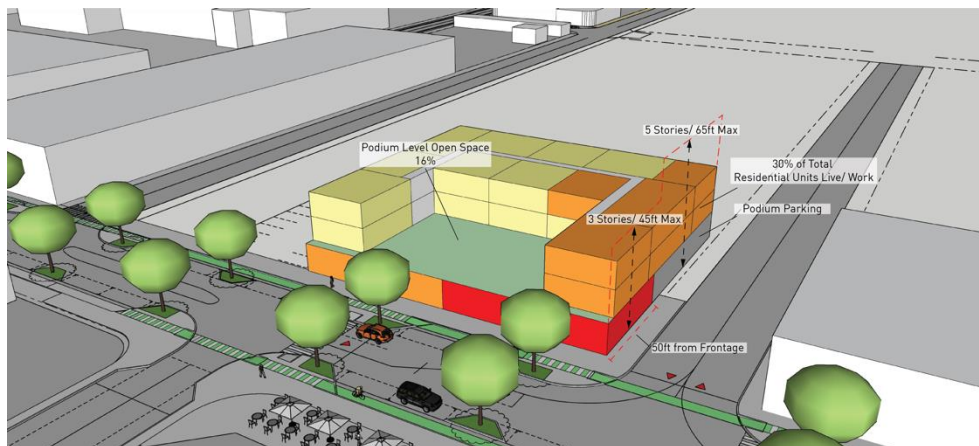


Figure B-3.

Appendix B: Constraints to Future Housing Development

Standards requiring 100 square feet of nonresidential space per residential unit and a 20-50% of the ground-floor Santa Fe Avenue frontage to be nonresidential uses are not a constraint for development. A review of recent residential developments in the Arts District shows that all contained nonresidential uses, in many cases comprising 25%-75% of the overall square footage of the project. It is often these nonresidential uses, which can include artist studios and other working spaces serving the residents of the building, which give projects their identity and enhance residential unit marketing. Indeed, developers have conveyed to the City that because there is a current lack of amenities in the area, commercial uses are important to establish the viability of projects.

Site Plan Review, Processing Times, and Related Programs

New single family and multi-family housing are currently only permitted within the Housing Overlay zone. For any residential use within the Housing Overlay zone, the approved Development Agreement specific to that residential use shall define the development standards and site planning standards that apply to all buildings, ancillary structures, land, and uses associated with that residential use. Where the approved Development Agreement is silent with regard to any development standard or site planning standard required by this title, the provisions of the underlying zone shall apply. The Development Agreement must be improved by Council and Council may impose any requirements they deem necessary to protect occupants from negative health impacts.

The City Council is the approval body for any proposed residential development and related Development Agreement. The Council is required to conduct one public hearing and must make a series of findings regarding the development's compatibility with the City's vision and standards.

The average processing time for a Development Agreement is one year. Renovation applications are put in by the City itself (for City owned properties); for privately-owned housing renovations, the processing time is 1-2 weeks. The City's requirements for a Development Agreement for residential development does impact timing, supply, and the certainty that developers have in the approval of their projects. The current processing procedure was established with the intention of securing only industrial development in the City of Vernon. The Westside Mixed Use District Zoning Amendment proposes by-right residential development in well suited areas, greatly reducing the constraints caused by the current processing procedure for residential development.

In order to address these constraints and increase the residential population of the City, the following programs have been included within this Element. The Westside Mixed Use District Zoning Amendment (Program 8) will permit multifamily housing by-right, resulting in much quicker processing times. Most projects will be subject to Design Review; however, Design Review will be conducted at the staff level as a ministerial process and without requirement of public hearing. Design review will be based on a limited set of objective standards in the Municipal Code. Additionally, projects which achieve a higher level of design (compliance with optional guidelines such as preserving elements of legacy industrial structures onsite) can access height bonuses, giving additional flexibility. Therefore, it is assumed that processing times will still be quick. Additionally, the Medium-Density Residential Zoning Program (Program 10) includes adopting a zoning designation to make all existing housing conforming, as most housing in Vernon currently is non-conforming. In addition, the Medium-Density Residential Zoning Program will allow a few units

Appendix B: Constraints to Future Housing Development

to be built per property. In most cases, the new residential zoning capacity of the housing sites will be larger than the number of existing residential units on the sites. The program will also permit manufactured housing in the same areas as other types of housing.

The typical single-family project in Vernon would be a renovation or addition to an existing home. As described above, such projects typically take 1-2 weeks to process, without public hearings. New single-family home projects will be permitted without need to rezone through the Medium-Density Residential Zoning Program (Program 10).

A new construction multi-family housing project would undergo Design Review by staff, based on objective design standards located in the municipal code, before extending a planning permit to the project. Projects are anticipated to take 2-4 weeks to provide a list of comments back to the applicant, enabling compliance with timelines established by PRC 21080.1 and 21080.2 No public hearings would be required, and approval certainty is not affected. Cost impacts would be minimal. Such projects would not be subject to CEQA.

An adaptive reuse multi-family housing project would undergo Design Review by staff based on objective design standards located in the municipal code as well as guidelines for the preservation of historic structures. Height bonuses would be given as a result of compliance with these preservation guidelines (there is no density limit, so there is no need for a density bonus). No public hearings would be required, and approval certainty is not affected. Cost impacts would be minimal and offset by increased number of units. Such projects would not be subject to CEQA. Only very large residential projects (greater than 100 units) or projects which request variances or zone changes would be subject to discretionary approval by City Council and CEQA analysis. Very large projects in the City are aptly restricted due to the fact that the residents of such projects could immediately form a majority of the voting populace of the City, posing challenges for stable and impartial governance.

The City in general prides itself on excellent customer service to businesses, including developers, and provides short turnaround times on permit applications (which are almost entirely industrial in nature currently). Application completeness and CEQA applicability are typically established within 30 days, and permits are extended to compliant projects in less than 60 days. The Public Works Director is the person responsible for determining application completeness and CEQA exemptions and will ensure compliance with PRC 21080.1 and 21080.2.

Through the Accessory Dwelling Unit Ordinance (Program 11) the City will develop and adopt an ADU ordinance within the sixth cycle planning period.

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The ADU ordinance will be in conformance with State law and encourage accessory dwelling unit construction.

Renovation, Restoration, Maintenance, and Repair

The City will continue to permit the renovation, restoration, maintenance, and repair of existing residential uses. Residential rehabilitation projects are permitted in Vernon, and the rehabilitation is a “Minor Alteration or Repair,” as defined in the Zoning Code (less than 50 percent of the fair market value of the buildings on the lot). As a practical matter, the expansive definition of “Minor Alteration or Repair” and lack of development standards result in limited governmental constraints (other than complying with the building code) that would prevent a homeowner from upgrading or improving a residence within the existing square footage.

If the hard costs of improvements equal or exceed, over a three- year period, 50 percent of the then-current fair market value of the building, then the improvement, if voluntary, will be defined as a “Major Alteration or Repair” and terminate the legal nonconforming status of the residence. A Major Alteration or Repair is considered to be the functional equivalent of a tear-down and rebuild, which the City does not currently permit. However, if the Major Alteration or Repair is necessitated by a natural disaster, such as an earthquake or fire, or other force majeure, the owner does have the right to rebuild the residence up to the square footage of the original residence. At that time, the development standards for the home would be developed. The City has not developed those criteria at this time since there are only forty-eight private residences in Vernon. Forty-five of these private residences belong to Vernon Village Park Apartments, an affordable housing development that was opened in 2015, and whose development standards are governed by the development agreement.

The Major Alteration provision does not constrain the maintenance of the existing housing stock, as property owners are permitted to undertake a broad array of improvements that extend the life of residential structures and improve unit conditions. Under State law, any and all such improvements can be pursued consistent with Health & Safety Code Section 17922(d) and Section 17958.8 relating to the alteration and repair of existing buildings. This section discusses the use of original materials and methods for the repair, replacement, or extension as long as it meets Building Code standards. The Zoning Code had no provisions or limitations on the construction materials utilized. Section 17958.8 is similar, as it addresses the use of original construction materials and methods. Nothing in the Zoning Code or Building Code prohibits the use of original materials and methods, with the exception of an unreinforced masonry structure, which would have to be seismically

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retrofitted. As no residential units in Vernon are constructed of unreinforced masonry, this does not affect any housing units.

The City of Vernon has recently renovated 24 of their 26 City-owned units. The remaining two units, though they are in good, habitable condition, will be renovated if needed over the next eight-year planning period. All private residential units in the City are in good condition, with no units requiring a major alteration during the planning period. The Vernon Village affordable project opened in 2015 and therefore will not require renovation for many years, past the 6th cycle planning period.

No private residential property owners have proposed major renovations to their properties. Residential property owners participated in the 5th Cycle Zoning Ordinance revision process, and none expressed opposition to the standards that apply to existing, nonconforming residential structures in the City, including the prohibitions on increasing square footage and undertaking major alterations. All residences – whether owned by the City or others – are in good condition, according to City staff. As described above, residential rehabilitation that constitutes a minor alteration (costing, over a three-year period, less than 50 percent of the market value of the building) is permitted. Because minor alterations are permitted and existing standards will allow renovations of these units, the limit on major alterations is not considered an impact to the maintenance and improvement of the City's housing stock. The Zoning Code has been revised to remove restrictions on major alterations as needed through the implementation of reasonable accommodation procedures.

It is the City's intent to encourage and actively participate in the rehabilitation of existing residential units. The process is straightforward and not burdensome; there is no entitlement process required for rehabilitation projects. Residential rehabilitation projects that are Minor Alterations or Repairs and do not exceed the existing square footage require only a building permit. The building permit process timeframe depends on the complexity of the renovation. Complex renovations involving new electrical systems, plumbing, etc. can take up to three weeks to process. The City has no intention of removing any of the 74 units in the City, as all units are in good condition.

The City will continue Program 1, Maintenance of City-Owned Residences, throughout the sixth cycle.

Building Code Amendments

The City has adopted the 2019 California Building Code with some minor local amendments related primarily to industrial buildings in the City. Per State

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Health and Safety Code Sections 17958.5 and 17958.7, the City made required findings and filed such findings with the California Building Standards Commission. The amendments include administrative processes such as the establishment of City permit fees and appeals boards, as well as requirements specific to hazardous and industrial uses such as fire access roads, spray booths, and storage of explosive and flammable materials. Vernon has also made additional amendments to protect the safety of workers and residents within the City. Specifically, the City requires all wiring to be in a metallic conduit, to protect workers and residents from hazards of accidentally driving a nail or screw through wiring. There is a marginal cost increase associated with this precaution, but the benefit associated with safer installation outweighs the cost. The price for a 2 inch by 10-inch metallic conduit is \$43.33 while the cost for the same PVC conduit is \$25.65.

The City has also made amendments to require Class A and B roofing material, which is more fire resistive and can stop the potential spread of fire. While this type of roofing material may be more expensive than some standard materials, this amendment is necessary to prevent and quickly extinguish fires that may have far more costly impacts. As such, no restrictions or amendments have been adopted in the Building Code that would constrain housing in the City.

Permit and Infrastructure Fees

The City's complete fee schedule, including building and engineering fees, is available on the City's website for public review. The City assesses various fees to cover the costs of permit processing (Figure B-4). Most of the fees charged are flat fees based on the cost of services, or tiered fees based on the size and cost of the improvement. Fees charged are comparable to surrounding communities in Los Angeles County, and as such, do not pose a constraint to housing renovation. Owners intending to renovate or improve existing residential units are required to obtain a building permit for a minor alteration. The fee, which is reviewed annually, is based on the cost of the improvement. The City of Vernon does not currently levy impact fees on new development.

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Building Permit Fees	
Permit Fees (Valuation)	Fee
\$1.00 to \$2,000	\$111
\$2,001 to \$5,000	\$111 for the first \$2,000 plus \$5.55 for each additional \$100 or fraction thereof, up to and including \$5,000.
\$5,001 to \$25,000	\$277 for the first \$5,000 plus \$13.87 for each additional \$1,000 or fraction thereof, up to and including \$25,000.
\$25,001 to \$50,000	\$555 for the first \$25,000 plus \$10.40 for each additional \$1,000 or fraction thereof, up to and including \$50,000.
\$50,001 to \$100,000	\$815 for the first \$50,000 plus \$7.63 for each additional \$1,000 or fraction thereof, up to and including \$100,000.
\$100,001 to \$500,000	\$1,196.00 for the first \$100,000 plus \$5.55 for each additional \$1,000 or fraction thereof, up to and including \$500,000.
\$500,001 and up	\$3,415 for the first \$500,000 plus \$4.29 for each additional \$1,000 or fraction thereof.
Plan Check Fee when required, shall be equal to 65% of the Permit Fee. Check Energy Fee 25% of the permit fee. Permit Energy Fee 10% of the Permit Fee.	
Inspection and Other Fees	
Description	Fee
Inspection Outside of Normal Hours (minimum of 4 hours)	\$244/hour (minimum of \$976)
Reinspection Fee	\$168/hour
Additional Plan Review (non-structural, structural)	\$136 - \$321/hour
Final, Parcel, or Tentative Map	\$5,585 - \$11,107 (for five or more parcels or lots)
Conditional Use Permit	\$16,628 plus applicant is responsible for cost to prepare the environmental document for the project plus a 25% admin fee, plus any County Surveyor and Clerk filing fees & Fish and Game Section fees.
Zoning Variance or Amendment	\$11,075
Building Code Variance	\$4,879

Figure B-4.
Source: City of Vernon General Fee Schedule, Effective July 1, 2021.

Code Enforcement

The Vernon Department of Public Works is responsible for code enforcement and the maintenance and upkeep of all City-owned units. Enforcement of building code standards does not constrain the improvement of housing in Vernon but instead serves to maintain or improve the condition of the limited, existing housing stock.

Of the 74 units in the City, 48 units are not owned by the City. Forty-five of those 48 units are part of the Vernon Village Park Apartments affordable development completed in 2015. Due to the recent completion of this project, it does not require improvement. City staff has investigated the remaining three private units and determined that none of these units require significant rehabilitation. At this time, an active code enforcement program is unwarranted due to the limited number of older privately owned units and the fact all units are currently in good condition and continue to be well maintained by the owners. However, in the future the City will need active code enforcement due to a desired increase of new housing units which are privately owned. Program 2 in this 6th Cycle Housing Element addresses the City's future need for code enforcement. The City encourages active maintenance of the housing stock, as evidenced by the extensive rehabilitation the City has undertaken on those housing units that it owns. Currently, Community Services Staff is active in the community, and will respond to any visible code enforcement violations or complaints that may require rehabilitation of units.

Property owners are permitted and encouraged to perform proper upkeep and maintenance, which can include renovations, as long as the existing square footage is not exceeded and the cost of the renovation, over a three-year period, does not exceed 50 percent of the market value of buildings on the lot. For all practical purposes, all other controls, permit processes, and fees do not constrain the maintenance and preservation of the City's housing stock. The City's Vernon Code Enforcement Program (Program 2) will continue throughout the sixth cycle.

On/Offsite Improvement Standards

The City's subdivision code conforms to the Subdivision Map Act (contained in Division 2 of Title 7 of the Government Code of the State of California) as well as typical subdivision practices. According to the City of Vernon's General Plan, local street widths are required to have a 60 to 65 feet wide right of way in addition to a pavement width of 42 to 49 feet. These General Plan standards are for the benefit of industrial trucking facilities in Vernon. The Housing Overlay zone allows variation from these typical City standards, as requirements for industrial trucking facilities are not the same as requirements

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for residential projects. Recent development in Vernon as well as future development in Vernon have been multi-family residential developments. Vernon does not anticipate new residential subdivisions as the City is already built out with mainly industrial uses.

The most expensive on/off improvements are for subdivisions. Unlike subdivisions, new residential projects in Vernon will not require large amounts of site improvements. It is typical that the costliest and most common site improvement is grading, however, the City of Vernon is leveled and does not require grading for the most part. The most common site improvement today in general is widening of industrial driveways in compliance with the City of Vernon Municipal Code and the State of California Fire Code. The City requires large driveways and truck loading spaces in industrial area, for industrial projects. However, residential projects are not subjected to these driveway and loading space standards. The Westside Mixed Use District Zoning Amendment includes a provision eliminating these driveway and loading space standards on residential uses within the plan area.

The City's Municipal Code also requires properties to treat stormwater per low-impact development requirements.

Additionally, the City's Public Works Department requires new signal light improvements from very large projects. It is unlikely that many residential projects will be large enough to trigger a signal light improvement. Should a residential project appear large enough, a traffic study would be required to determine whether a signal light improvement is necessary.

Additionally, through Program 17 the City will create standards for street widths within residential subdivisions and establish additional standards for on and off-site improvements, as deemed necessary through a review of the municipal code.

SB 35 Processing Procedure

Senate Bill (SB) 35 requires cities and counties to streamline review and approval of eligible affordable housing projects by providing a written process for ministerial approval, exempting qualifying projects from CEQA review. The City clarifies that there is currently no CEQA requirement for projects as projects are not required to go to a public body for approval. SB 35 can be utilized in a City when the State determines the City has made insufficient process towards their lower-income RHNA. In Cities where the State has made this determination SB 35 allows for streamlined ministerial approval of proposed developments with at least 50% affordability. If the City is also determined to have made insufficient progress towards their moderate-income

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RHNA, the City is subject to the more inclusive streamlining for developments with at least 10% affordability.

The City of Vernon is subject to SB 35 streamlining at this time, specifically the more inclusive streamlining for developments with at least 10% affordability. As of October 2021, the City has not received applications to streamline. This lack of applications to streamline is likely due to the lack of residential zoning within the City in addition to developer preference for industrial development in Vernon. Within this Housing Element (Program 17), the City of Vernon commits to creating a SB 35 checklist and written procedure for processing SB 35 applications. Additionally, the City will make more information available to developers of eligible projects.

Constraints to Housing for Persons with Disabilities

Housing element law requires an analysis of government constraints to the development of housing for people with disabilities. People with disabilities have specific housing needs related to accessibility of dwelling units; access to transportation; employment, and commercial services; and alternative living arrangements that include on-site or nearby supportive services.

Building Codes

The City has adopted the 2019 California Building Code. Standards within the Code of the City of Vernon (through the adoption of the California Building Code) include provisions to ensure accessibility for persons with disabilities. These standards are consistent with the Americans with Disabilities Act (ADA). No local amendments that would constrain accessibility or increase the cost of housing for persons with disabilities have been adopted, except that the Zoning Code does not permit the floor area of the residences to be increased or permit any major alterations that equal or exceed 50 percent of the current fair market value of the buildings on the lot.

Universal Design Element

The City of Vernon has not adopted a universal design ordinance governing construction or modification of homes using design principles that allow individuals to remain in those homes as their physical needs and capabilities change.

Definition of Family

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Sometimes, a city's definition of "family" can limit access to housing for persons with disabilities when the word is narrowly defined. This can illegally limit the use of housing as group homes for persons with disabilities, but not limit housing for families. The Vernon Municipal Code does not define family, and therefore is nondiscriminatory in its application.

Reasonable Accommodation

The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. While fair housing laws intend that all people have equal access to housing, the law also recognizes that people with disabilities may need extra tools to achieve equality. Reasonable accommodation is one of the tools intended to further housing opportunities for people with disabilities. Reasonable accommodation provides a means of requesting from the local government flexibility in the application of land use and zoning and building regulations or, in some instances, even a waiver of certain restrictions or requirements because it is necessary to achieve equal access to housing. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities, and to provide the accommodation when it is determined to be "reasonable" based on fair housing laws and the case law interpreting the statutes.

State law allows for a statutorily based four-part analysis to be used in evaluating requests for reasonable accommodation related to land use and zoning matters and can be incorporated into a reasonable accommodation ordinance or procedures. This analysis gives great weight to furthering the housing needs of people with disabilities and also considers the impact or effect of providing the requested accommodation on the City and its overall zoning scheme. Developers and providers of housing for people with disabilities must be ready to address each element of the following four-part analysis:

- The housing that is the subject of the request for reasonable accommodation is for people with disabilities as defined in federal or state fair housing laws;
- The reasonable accommodation requested is necessary to make specific housing available to people with disabilities who are protected under fair housing laws;
- The requested accommodation will not impose an undue financial or administrative burden on the local government;
- The requested accommodation will not result in a fundamental alteration in the local zoning ordinance.

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The City abides by the Fair Housing Act and has instituted a clearly defined process for making requests for reasonable accommodation to provide exceptions in zoning, land-use, permitting processes, and building codes. The City has developed reasonable accommodation procedures and will provide information on the procedures on the City's website (Housing Element Program 4). Additionally, during the 6th cycle the City will add the reasonable accommodation procedures to the Municipal code.

The State has removed any City discretion for review of small group homes for persons with disabilities (six or fewer residents). Group homes will be permitted in specific zones through the Westside Mixed Use District Zoning Amendment. The City does not impose additional zoning, building code, or permitting procedures other than those allowed by State law.

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. A retrofit would be permitted as a minor alteration (requiring a building permit), as long as the cost of the retrofit was less than 50 percent of the market value of the buildings. The City's requirements for building permits are standard, straightforward, and not burdensome. No CUP or other special permitting requirements are required for retrofitting homes for accessibility.

The City's adopted reasonable accommodation procedures are ministerial and include, but not be limited to, identifying who may request a reasonable accommodation (i.e., persons with disabilities, family-members, landlords, etc.), timeframes for decision-making, and provision for relief from the various land-use, zoning, or building regulations that may constrain the housing for persons of disabilities. The procedure also includes consideration of allowing an increase in habitable floor area of an existing residence to accommodate disabled persons.

The City will also explore the feasibility of offering fee reductions for permit processes that involve retrofitting residences for accessibility purposes.

Information Regarding Accommodation for Zoning, Permit Processing, and Building Codes

The City provides information to all interested parties regarding accommodations in zoning, permit processes, and application of building codes for housing for persons with disabilities.

Zoning and Land Use Policies and Practices

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The City of Vernon has not identified any zoning or other land-use regulatory practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals.

An example of the ways in which the City facilitates housing for persons with disabilities through its regulatory and permitting processes was in the Vernon Village housing development which has all ground-floor units fully accessible.

Permit and Processing Procedures

State law requires that residential care facilities with six or fewer residents be permitted by-right in residential zones. Therefore, the City of Vernon does not require conditional use permits for the permitting of licensed residential care facilities with six or fewer residents in the Housing Overlay zone.

Within the sixth planning cycle (Program 17) the City will not require conditional use permits for the permitting of licensed, residential care facilities with seven or more residents in the following zones within the Westside Mixed Use District Zoning Amendment area: MU-CC, MU-S, and MU-N. These residential care facilities will serve the disabled population in the City. The City of Vernon does not impose additional zoning, building code, or permitting procedures other than those allowed by State law. Residential care facilities are subject to the same zoning, building code, and permitting procedures that all other housing is subject to in the City. There are no constraints on housing for persons with disabilities caused or controlled by the City.

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. The process for requesting an accessibility retrofitting includes a zone clearance approval from the Planning Division, which takes about two weeks, and a building permit which takes ten working days. The City's requirements for building permits and inspections are the same as for other residential projects and are straightforward and not burdensome. In addition, the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint.

Efforts to Remove Regulatory Constraints for Persons with Disabilities

State law removed any City discretion for review of small residential care facilities for persons with disabilities (six or fewer residents) along with residential care facilities with seven residents or more. The City does not

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impose additional zoning, building code, or permitting procedures other than those allowed by State law. There are no City initiated constraints on housing for persons with disabilities caused or controlled by the City. The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements.

Non-governmental Constraints to Housing

In Vernon, limited land is available which would be suitable for the development of housing. The Housing Element inventory identifies two sites as the sites with the highest potential for residential development. The limited sites available for residential development are due to serious environmental conditions which render the majority of sites throughout Vernon unsuitable for residential development. Environmental factors affecting potential residential development are related to hazardous materials storage and processing, background contamination, noxious odors, noise pollution, and truck and railroad traffic generated by the City's pervasive industrial land uses. Inadequate access to residential services is an additional constraint to residential development in the City.

Land Cost and Availability

Currently, limited land is available for residential development in Vernon. This is due to Vernon being a built-out city as well as the zoning constraints on residential development in the city. However, these zoning constraints should change with the adoption of the Westside Mixed Use District Zoning Amendment. The Westside Mixed Use District Zoning Amendment will target residential development along Santa Fe Avenue.

Westside Stakeholders Advisory Committee members noted that land costs are currently high (in excess of \$100 per square foot) for properties in Vernon which are appropriate for modern warehousing, distribution and logistics facilities. These properties are several acres in size, with good truck access to freeways and arterial roadways. However, an analysis by HR&A Advisors found that small properties not suitable for these types of uses are trading for an average of \$53 per square foot, which as described below in the “Market Constraints” section is a suitable land cost to sustain residential development.

Market Constraints

While Vernon has not typically been a desired location for residential uses, recent years have seen the City be subject of several development inquiries seeking to construct new residential development within the City. This is due to the growing demand for urban housing and live/work units within a creative, industrial context. Residential development is expanding greatly within industrial districts of Los Angeles including Frogtown (Elysian Valley), the industrial area near Chinatown within the Cornfields/Arroyo Seco Specific Plan, and most importantly for Vernon, the Arts District. In the approximately twenty years of residential development in the Arts District, development has been moving toward the south, closer to the boundary of Vernon. Examples of urban lofts recently constructed/adaptively reused near the Westside Mixed Use District include:

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Residential Projects in Industrial Areas near Vernon					
Address	Distance from Vernon (mi)	Status	Units	Density (du/ac)	Type of Project
2349 S Santa Fe Avenue	0.08	Constructed	57	40	Adaptive reuse
2650 E Olympic Blvd	0.50	Pending Approval	2,000	100	New construction + adaptive reuse
1024 S Mateo St	1.10	Entitled	106	60	New construction
1850 Industrial Street	1.45	Constructed	104	80	Adaptive reuse
649 S Santa Fe Avenue	1.45	Constructed	320	170	New construction
520 Mateo St	1.65	Under Construction	475	220	New construction

Figure B-5.
Source: Southern California Association of Governments.

A financial feasibility analysis of the 5201 S Santa Fe site found the following assumptions: Residential rent at the site would be \$3.20 per square foot per month, residential hard costs would be \$225 per square foot, and parking costs would be \$38,000 per space (at/above-grade structured parking).

Based on the same analysis, the development at the site achieves a positive residual land value (\$118 per square foot), arguably exceeding the market value of the land (estimated \$53 per square foot for properties not suitable for modern warehousing development).

Density and Timing

A year transpired between the time the Vernon Village Park Apartments were approved and the time the building permit application was submitted. Over this year the developer obtained low-income housing tax credits, as the Vernon Village Park Apartments are an affordable development. The Vernon Village Park Apartments developed at a density of 22 units per acre, which is below what is expected in this Element's Site Inventory. The Vernon Village Park Apartments are an affordable project, not market rate.

Recently, the City has received two unsolicited proposals from developers for residential development within the City's westside. The first development proposal was for 108 housing units on a 0.8-acre lot for a density of 130 units per acre. A second development proposal was for 56 units on a 0.38-acre property for a density of 147 units per acre. Both of these proposed developments are not currently permitted under the City's Municipal Code; however, the Westside Mixed Use District Zoning Amendment proposes to allow residential development within the westside. Additionally, the market has shifted significantly, especially in areas within close proximity to the Downtown Los Angeles Arts District. Regarding lower density development, there have been no requests to develop residential units at a lower density than allowed in the past five years.

Based on these unsolicited proposals, there is interest in high density development in Vernon.

Construction Costs

The cost of building housing in the Los Angeles metro area is high. Hard costs make up more than 60% of total development costs for your average project. Hard costs include labor and materials. The hard cost price (per square foot) of constructing multifamily housing in the State climbed 25% over the decade from 2008 to 2018. Statewide, the average hard cost per square foot rose by \$45 from \$177 in 2008 to \$222 in 2018, after adjusting for inflation. This hard cost increase has been driven by the increased price of labor and certain building materials, such as wood, plastics, and composites. Between 2010 and 2020, the price of wood, plastics, and composites rose by 110%, after accounting for inflation; it then subsequently spiked during the pandemic.

Soft costs make up the second largest component of total development costs. These costs include fees, financing, consulting, tax, title, and insurance. Soft costs differ from hard costs because soft costs are not involved in physical construction. Fees in the City of Vernon are discussed in the "Permit and Infrastructure Fees" section of this Appendix. Financing costs are associated with obtaining equity and debt, as well as a developer fee. Consulting includes costs associated with professional services such as architects, engineers,

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plumbers, accounting, legal, and much more. Last, tax, title, and insurance costs account for the price of liability and builder's risk, as well as property taxes.

In California it is common for affordable housing projects to cost more on average than market-rate or mixed-income developments. Prevailing wage requirements are associated with the higher cost of building labor. Wages for construction occupations in California rose by 29% from 2006 to 2018.

As construction costs rise, the rental price of new rental units increases. For example, a multifamily unit that costs \$800,000 to build will require a \$4,000 per month rent, without subsidy, in order for the developer to make ends meet. It is important that construction costs remain as low as possible. Unfortunately, if construction costs run too high these costs can render housing projects infeasible.

Financing

Vernon has an extremely low rate of private, market-driven housing. For those who do want to purchase a home, as of early 2021, interest rates are at historic lows for mortgage seekers. However, lending criteria remain significantly stricter than prior to the 2007 housing crisis. With rent burdens high, saving for a down payment could present the largest barrier to low- and moderate-income residents becoming homeowners. Commercial lending for residential development, particularly dense multifamily development, is currently slow as the long-term effects of the COVID-19 pandemic are unclear.

Environmental Constraints

Given the industrial nature of the jurisdiction, all residential development will need to contend with environmental concerns that currently affect the City (further described below). These are issues that adversely affect existing residents and could affect future residents based on the location of new housing. In particular, environmental factors affecting potential residential development can be related to hazardous materials storage and processing, air quality, odors, noise pollution, and truck and railroad traffic generated by industrial land uses that are prevalent within the City. Inadequate access to residential services can be an additional constraint to residential development. These factors are a consideration as the City looks to opportunities to generate new housing. Program 22 contains many commitments to address environmental concerns within the City. Program 22's commitments will be explained at the close of this Environmental Constraints section.

While this data highlights environmental challenges that must be factored into any future housing land use decisions, it will not preclude the construction of new residential uses. However, it will require the City to give careful consideration to environmental conditions when demonstrating site suitability.

Hazardous Materials & Air Quality

Currently, the City experiences a high level of truck traffic, with trucks exiting the freeways and traveling along local roadways to any number of industrial facilities within the City. Trucks generate high levels of diesel particulate matter (DPM). Exposure to DPM is a health hazard, particularly for children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects are higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. In addition to truck traffic, heavy and prolonged industrial use in Vernon has contributed to existing conditions unhealthy air quality.¹

¹ The South Coast Air Quality Management District's (SCAQMD) Multiple Air Toxics Exposure Study (MATES) is a unique environmental justice program that has spanned more than three decades and provides a detailed assessment of the impacts of a group of air pollutants known as "air toxics", which are pollutants that can cause important health effects. Unlike the common "criteria air pollutants", there are no state or federal standards for ambient concentrations of air toxics. Examples of air toxics include gases, such as benzene and 1,3-butadiene, as well as particles, such as arsenic and diesel particulate matter. The MATES program is designed to assess overall long-term trends in air toxics levels in the community. It has long been recognized that air toxics levels vary across communities, and the MATES program provides important information to examine these differences.

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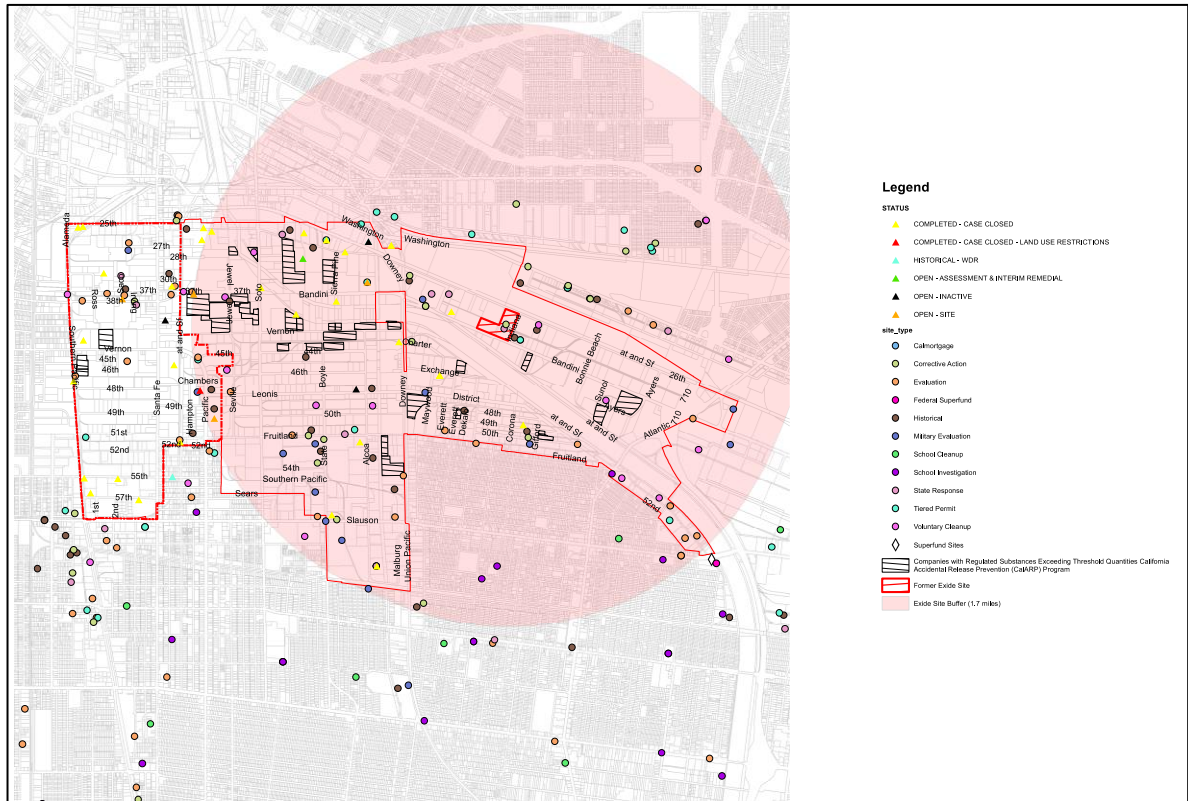
Figure B-6. Air Quality Risks.

Source: MATES IV, recommended buffers from AQMD.

- High risk of cancer. Based on the SCAQMD MATES V database, the estimated risk of cancer is 641 per one million throughout the City.² According to the MATES V Final Report (August 2021), the cancer risk in the South Coast Air Basin (Basin) region is estimated at approximately 455 per one million, and 576 per one million in the neighboring community of Huntington Park. Thus, the ambient cancer risk in the City of Vernon is higher than the average risk for the Basin.
- High non-cancer chronic health risks. Along with cancer risk estimates, MATES V includes information on the chronic non-cancer health impacts from inhalation and non-inhalation pathways through the collection of air toxics at fixed monitoring stations. The nearest monitoring station to the City is Huntington Park. Located just south of Vernon, this monitoring station reported the maximum residential non-cancer chronic hazard index is 5.0. The Hazard Index (HI) is an indicator of whether non-cancer

² South Coast Air Quality Management District's MATES V database, <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>; accessed November 2021.

Appendix B: Constraints to Future Housing Development



health effects can occur due to chronic exposure to toxic air contaminants. An HI greater than one does not mean that such health effects are expected, but rather that the likelihood of experiencing adverse health effects increases. Although the likelihood of experiencing an adverse non-cancer health effect may not scale linearly with the HI, a larger HI would generally indicate a greater likelihood of experiencing those health effects in the exposed population. The non-cancer chronic hazard index of 5.0 near the City is considered to be a relatively high hazard index as compared to other locations in the Basin.

- Numerous permitted industrial facilities. According to the SCAQMD's Facility Information Detail (FIND) database,³ there are 1,031 regulated facilities required to have air quality permits. These range from dry cleaners and gas stations to manufacturing and industrial plants and are a general indicator of the preponderance of air pollution sources.

³ <https://www.aqmd.gov/nav/FIND/facility-information-detail>, accessed November 2021.

Figure B-7. Soil Contamination Risks.

Sources: Geotracker, Envirostor, Department of Toxic Substances Control, City of Vernon.

- Hazardous material storage tanks. According to the State Water Resources Control Board⁴, there are 25 leaking underground storage tank clean-up sites in Vernon.
- Hazardous materials release sites. According to the California Environmental Protection Agency's (CalEPA) Cortese list database, there are three facilities in Vernon that are identified as hazardous materials release sites by the Department of Toxic Substance Control. The first is the Exide Residential/Parkways cleanup site located at 2700 South Indiana Avenue, the second is the facility identified as Pechiney located at 3200 Fruitland Avenue, and the third is the facility identified as AAD Distribution and Dry Cleaning, Inc. located at 2306 E. 38th Street.
- Exposure from Soil Contamination. As a city with a 100-year-long industrial history, there are numerous sites in Vernon with soil contamination issues which will need to be addressed during new development (see Figure B-7).
- Hazardous Material Storage. Within the City, approximately 570 businesses handle/store hazardous materials. Thirty-eight of these businesses handle high levels of extremely dangerous materials regulated by the State.
- Underground Pipelines. There are numerous underground pipelines throughout the City, many carrying potentially explosive materials.
- Railroads. There are approximately 130 miles of railroad track historically treated with herbicides for weed control. Rights-of way show patterns of contamination from spilling, overfilling, or transfer of chemicals.
- Waste Facilities. The City has four California EPA-permitted hazardous waste treatment, storage and disposal facilities. There are also ten closed landfill sites.

While many of these environmental conditions represent a higher than average risk of pollutant exposure for potential residents, there are still opportunities for diversifying development. The California Air Resources Board (CARB) recommends avoiding siting sensitive receptors within 500 feet of freeways and

⁴ California State Water Resources Control Board, Geotracker, <https://geotracker.waterboards.ca.gov/>; accessed November 2021.

Appendix B: Constraints to Future Housing Development

1,000 feet of railyards. The City has identified two housing element sites in the southern portion of the City. These sites are not located within 500 feet of a freeway, nor 1000 feet of a railyard. As illustrated in Figure B-6, the west side of the City has lower cancer risk 1) due to a lower concentration of heavy industrial uses and 2) due to the prevailing wind, which typically travels from the west to the east. As a result, odors and pollutants are typically carried across the City to the east.

The City has developed programs to assist in controlling hazardous materials. One such program is the “right to know” program. All businesses in the City are required to submit inventories of all hazardous materials used or stored. The City currently has 571 businesses that handle or store hazardous materials. Class C businesses with very high maximum daily volumes (2,001 to 1,000,000 pounds) are the most prevalent and are located throughout the City. The risk of upset from businesses handling such high volumes of chemicals, many of which are toxic, is a factor that must be considered in land use planning. Generally, businesses with highly toxic chemicals are further regulated through the California Accidental Release Prevention Program (CALARP). Such businesses are required to provide the City’s Environmental Health Department with a CALARP report detailing how they plan to prevent the release of such chemicals, as well as presenting a plan for clean-up and notification if there were an accidental release. Such regulated chemicals include ammonia and chlorine gas and could impact a large geographic area if released. In Vernon there are currently 38 businesses regulated under CALARP.

Based on review of the Geotracker, Envirostor and DTSC databases, the two Housing Element sites have not been identified as contaminated sites.⁵ The location of the two sites within the Westside of the City situates them furthest away from the most heavily polluting uses in Vernon. The most heavily polluting uses in Vernon are located within the City’s rendering overlay zone along the Los Angeles River in the northeast portion of the City. However, given the long industrial history, all developments will have to undergo Phase I Environmental Site Analyses as part of their environmental clearance process, leading to a Phase 2 and/or 3 analyses if necessary. Soil remediation measures may be required.

Noxious Odors

Numerous industries that generate noxious odors operate in Vernon, including several focused on the slaughtering and rendering of animals. Overlay districts have been designated in the City’s General Plan and Zoning Ordinance to isolate the locations of offensive industrial uses responsible for excessive

⁵ See baseline studies report, Soil Contamination Map.

Appendix B: Constraints to Future Housing Development

noxious odors. These overlay districts include a “Slaughtering Overlay” for uses which involve the slaughtering of animals, and a “Rendering Overlay” for the location of rendering facilities. To address these concerns, all newly constructed buildings, or new uses in existing buildings within the Slaughtering (S) Overlay Zone and Rendering (R) Overlay Zone are required to comply with Development and Performance Standards (Section 26.4.1-7) and Site Planning Standards (Section 26.4.1-8). Additionally, the City Council may impose as a part of the Conditional Use Permit any other requirements as are necessary to protect nearby owners and occupants from odor and other environmental concerns. The two Housing Element sites are not located near or adjacent to these overlay zones. Residential uses are not permitted within these areas.

Noise

Noise sources in Vernon include stationary industrial activity, as well as from trucks, automobiles, and railroad operations. Numerous companies operate equipment such as large presses and pumps which produce excessive vibrations and generate noise well beyond the level of acceptability for noise-sensitive land uses within the vicinity. Arterial roadways in Vernon have a very high proportion of truck traffic (approximately 30 percent), thereby intensifying noise levels along the City's roadways. In addition, four main railroad lines and a number of switching operations are located in the City, and these generate significant levels of noise day and night.

Truck and Railroad Traffic

Vernon is traversed by approximately 130 miles of railroad tracks, with approximately 96 at-grade and seven grade-separated railroad crossings. As previously mentioned, truck traffic is extremely heavy, comprising nearly one-third of all traffic in the City. The construction of the Alameda Corridor has consolidated rail traffic between the Ports of Los Angeles and Long Beach and downtown Los Angeles, and no plans have been announced to vacate existing mainline railroads. Some spur tracks have been eliminated but have been replaced by truck transportation. Also, the rail lines are being considered as routes for California High Speed Rail in the Orange County to Los Angeles segment.

Much of the truck traffic in the City is generated as a result of the close access to the regional freeway system.⁶ Trucks traveling from Vernon to the rest of the region primarily take SR-60 East, I-710 South via Bandini Boulevard, and I-5 North and South. The most common routes within the west side to access these freeways are Santa Fe Avenue, Alameda Street East, and Alameda Street West. As discussed previously, truck trips contribute to both noise and air quality concerns for residential uses. Limiting truck traffic in the west side of the City and around areas such as the two Housing Element sites could reduce both air quality and noise exposure for future residents. CARB recommends a 1,000-foot buffer between sensitive uses and distribution centers that generate more than 100 truck trips per day. No uses within the area of the two Housing Element sites reach that threshold of 100 trips per day. Additionally, Site 2 of the Housing Element is located approximately 600 feet away from the closest use that generate over 50 truck trips per day. Sites 1 is located approximately 1,170 feet away from the closest use that generates over 50 truck trips per day.

⁶ Iteris Technical Memorandum, Vernon Westside Specific Plan Analysis

Appendix B: Constraints to Future Housing Development

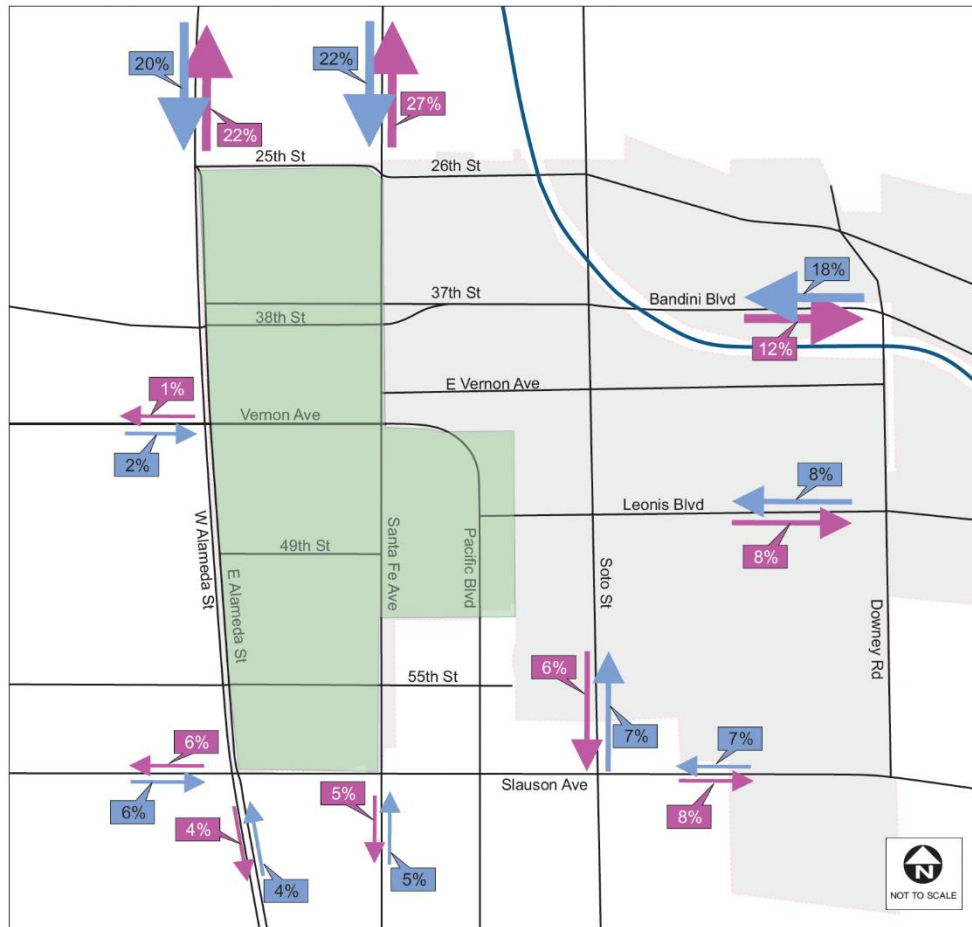


Figure B-8. Westside Truck Distribution (Inbound/Outbound).

Sources: Iteris Technical Memorandum, Vernon Westside Specific Plan Analysis.

Through Program 22 (Environmental Justice), the City commits to a number of actions to address some of the environmental constraints mentioned in this section. First, the City will complete an Environmental Justice Element by the end of 2027. Second, the City commits to continuing to coordinate with the California Department of Toxic Substances Control (DTSC) on the Exide Residential cleanup for residential units within the City. As part of the Exide Residential cleanup the DTSC oversees the investigation and cleanup of the residential properties, schools, parks, daycare, and childcare centers within the approximately 1.7-mile radius area of the former Exide Technologies (Exide) facility in Vernon, California. Third, the City commits to providing transit outreach by implementing the Transportation Demand Management (TDM) standards within the Westside Mixed Use District Zoning Amendment. Fifth, the City will continue to cooperate with other agencies on the creation of the LA River Bike Path. Sixth, the City will hold one meeting every two years at the affordable Vernon Village Park Apartment for residents to inform them of City services and inform them of opportunities to become involved with municipal decision making, including the Environmental Justice Element.

Implications for Housing Policy

Appendix B: Constraints to Future Housing Development

As required by the RHNA, the City must identify locations for a variety of housing units. The challenge in the City will be to identify locations that are suitable for housing in light of the environmental constraints identified herein. Guidance from regulatory agencies caution the siting of residences and other “sensitive land uses” that could be adversely affected by environmental pollution.

In April 2005, CARB published the Air Quality and Land Use Handbook to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of toxic air contaminant (TAC) emissions. The recommendations are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB’s siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

The environmental setting in Vernon and CARB guidance on siting of residences pose challenges on two levels. First, infrastructure investments will be needed to help improve the livability in areas that can accommodate more housing. For example, reducing local exposure to diesel truck traffic would help reduce localized exposure to DPM, while increasing a tree canopy will improve the livability of neighborhoods. Second, building design will be helpful in reducing exposure to negative environmental effects, particularly air quality. Installing high efficiency filters in heating, ventilation, and air conditioning (HVAC) equipment will help reduce exposure of residents to indoor air pollution. 5th Cycle Housing Element Policy 1.2 already requires HEPA filters in all new development in the City. Orienting development away from freeways, distribution centers, and other sources of air pollution and toxic emissions can help reduce exposure as well.

Opportunities for Energy Conservation

City Initiatives. As identified in Program 18, the City will review the City’s Zoning Ordinance and subdivision requirements, as well as other applicable codes, to promote energy conservation in housing rehabilitation and in the construction of new housing. This program will supplement existing City efforts

Appendix B: Constraints to Future Housing Development

in the enforcement of the State's construction codes requiring energy efficiency in new construction.

State Regulations and Programs. Title 24 of the California Administrative Code establishes energy conservation standards that must be applied to all new residential buildings. The regulations specify energy saving design for walls, ceilings and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. Compliance with the energy standards is achieved by satisfying certain conservation requirements and an energy budget. Among the alternative ways to meeting the energy standards are the following:

- Alternative 1: The passive solar approach which requires proper solar orientation, appropriate levels of thermal mass, south facing windows, and moderate insulation levels.
- Alternative 2: Generally, requires higher levels of insulation than Alternative 1, but has no thermal mass or window orientation requirements.
- Alternative 3: Also, is without passive solar design but requires active solar water heating in exchange for less stringent insulation and/or glazing requirements.

Residential developers must comply with these standards while localities are responsible for enforcing the energy conservation regulations.

The California Department of Community Services and Development in partnership with the network of local community services agencies that assist lower-income households, administers the Low-Income Home Energy Assistance Program (LIHEAP) and Energy Low Income Weatherization Assistance Program (DOE-LIWAP). LIHEAP provides financial assistance to lower income households to offset the costs of heating and/or cooling their residences. DOE-LIWAP provides installation and weatherization measures that increase energy efficiency of existing residential and multi-family dwellings occupied by lower-income persons. Eligible weatherization services include a wide variety of energy efficiency measures that encompass the building envelope, its heating and cooling systems, its electrical system, and electricity consuming appliances.

Private Sector Programs. The following private sector energy conservation programs are available to housing developers and Vernon residents:

Appendix B: Constraints to Future Housing Development

California Alternative Rates for Energy (CARE): Lower-income customers enrolled in the CARE program receive a 20% discount on their electric and natural gas bills. CARE is funded through a rate surcharge paid by all other utility customers.

Energy Assistance Program Rate (EAPR): Includes a one-year electric rate reduction home energy audit, free compact fluorescent lights, and replacement of inefficient refrigerators. Income qualification and enrollment by Red Cross.

Family Electric Rate Assistance Program (FERA): This program was developed for families whose household income slightly exceeds the threshold for assistance in other energy program allowances. Qualifying households have some of their electricity usage billed at a lower rate.

Low Income Energy Efficiency Program (LIEE): The LIEE program provides no-cost weatherization services to lower income households who meet the CARE guidelines. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelop repairs that reduce air infiltration.

Appendix C: Housing Resources

Planning, financing, developing, and operating housing requires resources of many varieties, such as land, financial, and human resources. This Appendix summarizes the City's requirement for adding housing within the City of Vernon, identifies sites on which that requirement can be accommodated, identifies resources to financing new housing, recognizes City policies and programs that will impact housing development, and discusses opportunities for energy conservation.

Future Housing Needs

State law requires that each community build a certain number of new housing units to keep up with the region's housing need. The Southern California Association of Governments (SCAG) 6th Housing Element Cycle Regional Housing Needs Allocation (RHNA) for the City of Vernon is nine (9) units. This section discusses the City of Vernon's ability to accommodate their RHNA during the eight-year planning period.

RHNA Requirement & Adequacy of the Sites Inventory

The RHNA covers the planning period from June 30, 2021, through October 15, 2029. The City of Vernon must identify adequate land with appropriate zoning and development standards to accommodate its allocation of the regional housing need.

The City of Vernon's required nine RHNA units are split between the very low- and low-income levels as seen in Figure C-1.

Appendix C: Housing Resources

City of Vernon 6 th Cycle Regional Housing Needs Allocation	
Income Level	Units
Very-Low Income (<50% of AMI)	5
Low-Income (50 to 80% of AMI)	4
Moderate-Income (80 to 120% of AMI)	0
Above Moderate Income (>120% of AMI)	0
Total	9

Figure C-1.

Source: Southern California Association of Governments.

Figure C-2 provides a summary of how the City of Vernon demonstrates adequate sites to satisfy the jurisdiction's Regional Housing Assessment. The two sites within the site inventory demonstrate a realistic capacity of 52 units. Figure C-3 maps the locations of the two Housing Element sites, within the Westside of Vernon.

City of Vernon 6 th Cycle Site Inventory				
Site Address	Lower	Moderate	Above Moderate	Total
5201 S Santa Fe Avenue	25	0	33	58
5592 and 5600 S Santa Fe Avenue	19	0	0	19
Total	44	0	33	77

Figure C-2.

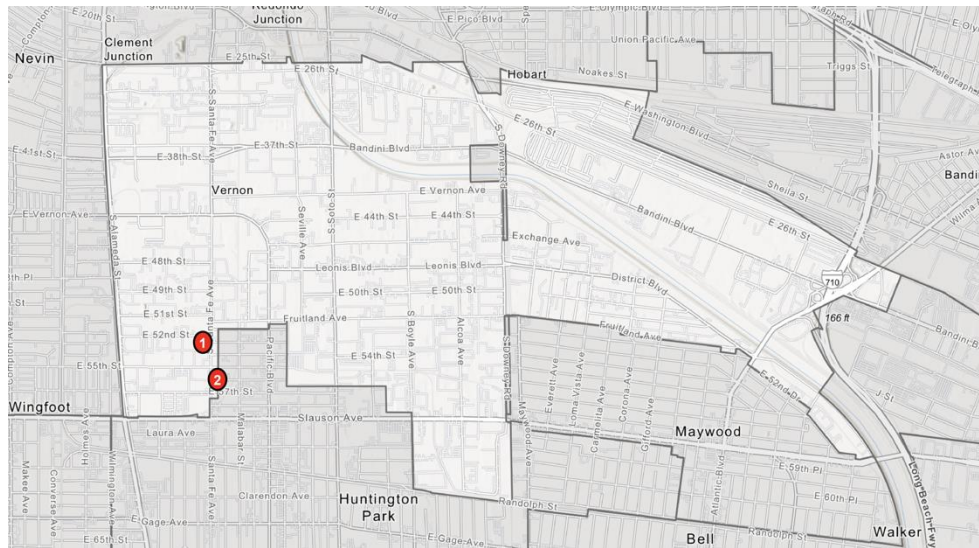


Figure C-3. Site Inventory Map.

Housing Site #1: 5201 S Santa Fe Avenue



Figure C-4.

Appendix C: Housing Resources

SITE AREA - 85,000 OVERALL
PARKING - 87,900 SF SURFACE (101 SPACES)
FACTORY/ INDUSTRIAL - 0 SF
OFFICE - 7,403 SF
RESTAURANT - 7,043 SF SF RESTAURANT (225 SEATS) + 2,500 SF ROOFTOP RESTAURANT
PPRODUCTION RETAIL - 4,318 SF
33 LIVE/WORK LOFTS

LEGEND

- Factory/ Industrial
- Retail
- Restaurant
- Food halls, Markets, Co-ops
- Production-Retail
- Mixed-use (Resi/Retail)
- Residential
- Live-work
- Office
- Civic/Public



LEVELS 2-3

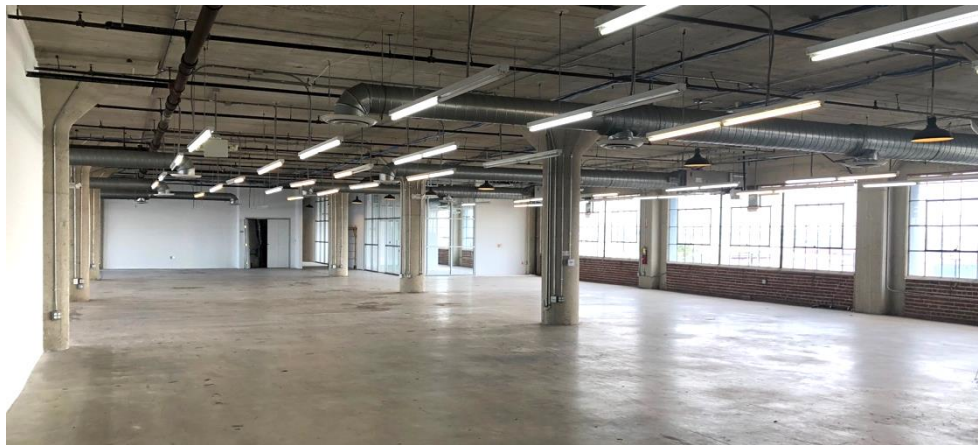


Figure C-5. Mixed Use District Catalytic Site Concept.
Source: City of Vernon.

This site consists of one 1.96-acre privately owned parcel (#6308-016-041) located within the southern portion of the Westside Mixed Use District Zoning Amendment area. Current General Plan land use designation is Industrial with Commercial Overlay; however, it will be adjusted to Mixed-Use with adoption of the Westside Mixed Use District Zoning Amendment. The site is zoned Commercial-2; however, the zoning will be adjusted to MU-S (Mixed-Use Santa Fe South), allowing residential uses with the adoption of the Westside Mixed Use District Zoning Amendment. The zoning will allow by-right adaptive reuse and new construction of residential buildings of at least 3-5 stories with no density limit.

The parcel is improved with two structures, including a large three-story structure, constructed in 1925, with excellent original features, high ceilings and natural lighting making it a prime candidate for adaptive reuse into residential or live/work lofts. As of last contact the building was unoccupied. The owner of this property has been involved in the development of the

Westside Mixed Use District Zoning Amendment and has expressed interest in this type of development on their property.

To inform the development of the Westside Mixed Use District Zoning Amendment, the City initiated a redevelopment study of several catalytic, or test, sites. The site has been labeled a catalytic site within the Westside Mixed Use District Zoning Amendment, which provides an extensive analysis of future uses on this parcel (see Figure C-5). Working with the property owner and City staff, the City's consultants, The Arroyo Group and Lorcan O'Herlihy Architects created a preferred development concept for the site which adheres to all proposed zoning standards. The concept proposes 33 live/work lofts on floors two and three of the aforementioned structure, with supportive uses and amenities on the first floor and in the smaller adjoining building. Economics firm HR&A Advisors conducted a financial feasibility analysis on the development concept, finding it to be economically feasible with a residual land value of \$118 per square foot.

In addition to the building itself, the site contains a 0.9-acre parking lot. Availing itself of shared and on-street parking incentives provided through the mixed-use district zoning, parking needs for this development could be accommodated in 0.4 acres, leaving 0.5 acres of the parking lot available for development of a new structure. See Appendix B's "Westside Mixed Use District Zoning Amendment" section for the full analysis of the proposed plan, which illustrates that new construction sites can accommodate a density of roughly 100 dwelling units per acre, or 50 units per acre without subterranean parking. Additionally, within Appendix B's "Density and Timing" section, the City outlines two recent development proposals which both significantly exceed the density assumption within this Element of 50 units per acre. Applying this 50 du/ac realistic capacity assumption to this development, an additional 25 units could be constructed on the site. These 25 units have been assigned to the lower-income category, while the 33 adaptive reuse units have been assigned to the above-moderate income category according to the assumptions made in the economic analysis.

Appendix C: Housing Resources

Housing Site #2: 5592 and 5600 S Santa Fe Avenue



Figure C-6. Housing Element Site #2 and Preliminary Concept.
Source: Andmore Partners.

This site consists of two privately owned parcels located within the southern portion of the Westside Mixed Use District Zoning Amendment area. These parcels feature the same owner and are located across the street from each other. The owner has expressed interest in redeveloping the property as a residential mixed-use project, including submitting a preliminary concept to the City and attending a meeting of the Westside Stakeholders Advisory

Committee to build support for the project. The Stakeholders Advisory Committee responded favorably to the proposal.

5592 S Santa Fe Avenue is a vacant lot while 5600 S Santa Fe Avenue is occupied by a small abandoned industrial building and a large, paved parking lot. These unoccupied uses present no barrier to redevelopment of the site, making development highly likely within the 6th Cycle planning period. The Parcels #6309-005-008 and #6309-006-012 combine for a 0.38-acre site. Current General Plan land use designation is Industrial with Commercial Overlay; however, it will be adjusted to Mixed-Use with adoption of the Westside Mixed Use District Zoning Amendment. The site is zoned Commercial-2; however, the zoning will be adjusted to MU-S (Mixed Use Santa Fe South) allowing residential uses with the adoption of the Westside Mixed Use District Zoning Amendment. The site has a realistic capacity of 19 lower income units based on a lower limit realistic density of 50 units per acre for new construction sites. See Appendix B's "Westside Mixed Use District Zoning Amendment" section for the full analysis of the proposed plan, which illustrates that new construction sites can accommodate a density of roughly 100 dwelling units per acre, or 50 units per acre without subterranean parking. Additionally, within Appendix B's "Density and Timing" section, the City outlines two recent development proposals which both significantly exceed the density assumption within this Element of 50 units per acre.

Since the two sites are separate parcels, separated by a public street, Program 20 (Lot Consolidation) commits the City to grant incentives for the development of this site and other small sites in the Mixed-Use District, such as more flexible height and parking standards, in exchange for the provision of on-site affordable housing. The sites will also be evaluated together, so that required project elements such as nonresidential space, open space and parking can be provided on one site to serve both sites. Through Program 20, the City will also evaluate supplementing the land area of this site and other constrained sites by repurposing or allowing projects to use public right-of-way. In this case, the 60-foot right of way of 56th Street which runs between the two lots could be narrowed or vacated to create additional open space or developable area to support the project.

Market and Development Trends and Likelihood of 100 Percent Nonresidential Development

Figure B-5 (reproduced here) illustrates the high interest in redeveloping properties in industrial areas near Vernon into residential uses with a density at least that assumed in the Element, and in many cases far greater. Arts District development is proceeding ever closer to the edges of the Westside.

Appendix C: Housing Resources

Residential Projects in Industrial Areas near Vernon					
Address	Distance from Vernon (mi)	Status	Units	Density (du/ac)	Type of Project
2349 S Santa Fe Avenue	0.08	Constructed	57	40	Adaptive reuse
2650 E Olympic Blvd	0.50	Pending Approval	2,000	100	New construction + adaptive reuse
1024 S Mateo St	1.10	Entitled	106	60	New construction
1850 Industrial Street	1.45	Constructed	104	80	Adaptive reuse
649 S Santa Fe Avenue	1.45	Constructed	320	170	New construction
520 Mateo St	1.65	Under Construction	475	220	New construction

Figure B-5.
Source: Southern California Association of Governments.

While the Mixed-Use Zones allow 100% nonresidential development as well as residential development, the strong likelihood of residential development is evidenced in that two developers have reached out to the City, unsolicited, with desires to pursue projects in the Westside/mixed-use areas. and both of these are residential. The City has not received applications for new light industrial facilities, offices or other uses permitted in the mixed-use zones. The parcels are too small for logistics or other modern industrial uses which are generating the greatest number of nonresidential development applications in the City as a whole. Still, in order to account for any potential nonresidential development which may occur, the inventory includes two sites which can accommodate the City's RHNA.

Infrastructure

The City of Vernon conducted a comprehensive evaluation of infrastructure within the Westside as a part of its Westside Specific Plan Baseline Studies Report (January 2021) and has reviewed its capacity vis a vis potential growth of up to 875 housing units within the areas covered by the Westside Mixed Use District Zoning Amendment, including the two sites inventory sites and their

realistic capacity of 77 units. The analyses have found that the City possesses wet and dry infrastructure that has high capacity and good quality due to decades of investments designed to produce high-quality service to high-usage industrial businesses. There are no capacity deficiencies identified, especially in the water system. The sewer system likewise is anticipated to have sufficient capacity for future growth.

Zoning for a Variety of Housing Types

The City of Vernon's housing element must identify and analyze sites with appropriate zoning that will encourage and facilitate a variety of housing types.

Emergency Shelters

Emergency shelters of up to 40 beds will be permitted by right (without any discretionary action required) in the City's Santa Fe North zone, as identified in the Westside Mixed Use District Zoning Amendment (Program #8). The processing procedure for emergency shelters in the Santa Fe North zone will be the same as the City's current process which permits emergency shelters by right in the Emergency Shelter Overlay zone. Emergency shelters will be permitted by right in the Santa Fe North zone, without any discretionary actions required by the City. The development of an emergency shelter of up to 40 beds will be permitted by right in the Santa Fe North zone without any public meetings or public noticing. Emergency shelters will be exempted from design review requirements.

Within the Santa Fe North zone multifamily residential and live/work uses are permitted. The Santa Fe North zone is currently occupied by many old vacant one- and two-story industrial buildings that have the potential to be converted into shelters for unhoused residents. Approximately half of the identified properties within the Santa Fe North zone are considered viable adaptive reuse opportunities. Additionally, more than half of the identified properties have potential for development or redevelopment. The properties identified within the Santa Fe North zone total approximately 54 acres. Therefore, approximately 27 acres within the Santa Fe North zone have a potential for new development or adaptive reuse.

The parking requirement for emergency shelters in the Santa Fe North zone will meet the requirements of AB 2339. AB 2339 states that emergency shelters shall be required to "provide sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone." The proposed Westside Mixed-Use Zoning Amendment (which will create the Santa Fe North zone) states that no

Appendix C: Housing Resources

parking will be required for emergency shelters. In any case, the City commits to adopting parking standards which comply with AB 2339 as a component of Program #8.

Additionally, Metro bus stops line Santa Fe Avenue within the Santa Fe North zone. Metro Bus Route 60 connects Downtown Los Angeles to Long Beach, and it is identified as a high-quality transit route as it has consistent frequency during AM and PM rush hours.

Emergency Shelters permitted by right (without any discretionary action required) in the City's Santa Fe North zone can accommodate up to 40 beds per shelter. A review of similar emergency shelters within the Los Angeles region reveals that a 40-bed emergency shelter takes up approximately .27 acres. Lots in the Santa Fe North zone range from .07 to 2.87 acres. As such, the area can accommodate its sufficient capacity of emergency shelters to serve the homeless population in the City of Vernon, which was last counted at 9 individuals during the 2022 LAHSA Homeless Count.

The entirety of Vernon and Southeast Los Angeles feature environmental constraints, due to the proximity of industrial uses. However, the westside of Vernon tends to be less impacted by environmental hazards, as described in depth within Appendix B (Housing Constraints) of this Element.

Currently, the Emergency Shelter Overlay zone is the only zone which permits emergency shelters by right in the City. Other uses, besides emergency shelters, require a conditional use permit for consideration within the Emergency Shelter Overlay zone. The Emergency Shelter Overlay zone is an approximately one-acre area located in the northwest corner of the City, close to where the Santa Fe North zone is projected. The City of Vernon's Municipal Code Section 17.52.040 define the development and site planning standards for emergency shelters within the Emergency Shelter Overlay zone. These development and site planning standards include: 1) Emergency shelters shall contain a maximum of 10 beds and shall serve no more than 10 homeless persons at a time; 2) Occupancy by an individual or family may not exceed 180 consecutive days unless the management plan provides for longer residency; 3) A minimum distance of 300 feet shall be maintained from any other emergency shelter, as measured from the property line; 4) Adequate external lighting shall be provided for security purposes; 5) A security and safety plan shall be provided for the review and approval by the Director; and 6) The facility may provide services separate from sleeping areas such as recreation area, counseling center, laundry, kitchen, dining hall, and client storage areas. Lastly, the parking requirement for Emergency Shelter Overlay Zone are as follows: 1 space for each 5 beds plus 2 additional spaces. For new building construction, 6% of required parking spaces, rounded up to the nearest whole number, shall be equipped with a Level 2 or higher EV charger. In Program #17,

the City commits to adjusting or removing this requirement to harmonize with emergency shelter parking requirements in the Santa Fe North zone and comply with AB 2339.

Transitional and Supportive Housing

According to State Government Code Section 65583(a) (4 & 5), transitional and supportive housing are considered residential uses and subject to only those restrictions that apply to other residential dwellings of the same type in the same zone. Vernon Municipal Code 26.4.6-4 explicitly permits supportive and transitional housing in the Housing Overlay Zone, subject to a Conditional Use Permit, as required for all types of housing. The Westside Mixed Use District Zoning Amendment (Program #8) will permit by-right supportive housing development zones where multifamily and mixed-uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. Transitional and supportive housing will also be permitted by-right, outside of the Westside Mixed Use District Zoning Amendment area, in any zone where multifamily and mixed-uses are permitted by-right, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. (Program 17)

Per AB 101, the City will review its zoning ordinance and make revisions if necessary to allow low barrier navigation centers for the unhoused per Government Code 65660-65668. (Program 17)

Farmworker Housing and Employee Housing

The City of Vernon does not have a farmworker population; therefore, sites do not need to be identified. The City does encourage and facilitate multi-family housing and ADUs (Program 11) which will support employees that live in Vernon. Additionally, the Employee Workforce Housing Program (Program 15) should establish employee housing in the City of Vernon over the sixth cycle planning period.

The California Legislature enacted the Employee Housing Act (EHA) to provide protection for persons living in privately owned and operated employee housing. The EHA is specifically designed to ensure the health, safety, and general welfare of these residents and to provide them a decent living environment. The EHA also provides protection for the general public which may be impacted by conditions in and around employee housing. Any employee housing that has qualified, or is intended to qualify, for a permit to operate pursuant to the EHA, may invoke the following provisions:

Appendix C: Housing Resources

- Any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation. Employee housing shall not be included within the definition of a boarding house, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling.
- No conditional use permit, zoning variance, or other zoning clearance shall be required of employee housing that serves six or fewer employees that is not required of a family dwelling of the same type in the same zone. According to the State Housing law, employee housing for six or fewer persons must be treated as regular housing.
- The use of a family dwelling for purposes of employee housing serving six or fewer persons, shall not constitute a change of occupancy pursuant to any local building codes.
- Employee housing that serves six or fewer employees shall not be subject to any business taxes, local registration fees, use permit fees, or other fees to which other family dwellings of the same type in the same zone are not likewise subject.
- For the purposes of any contract, deed, or covenant for the transfer of real property, employee housing which serves six or fewer employees shall be considered a residential use of property and a use of property by a single household.
- Each county and city shall permit and encourage the development and use of sufficient numbers and types of employee housing facilities as are commensurate with local needs. This section shall apply equally to any charter city, general law city, county, city and county, district, and any other local public entity.

The City of Vernon's Zoning Code does not currently address small employee housing. Program 17 has been included within this Element to add a definition of small employee housing and make provisions for small employee housing to be permitted in all zones where single-family housing is permitted.

Manufactured Homes and Factory-Built Housing

Manufactured homes are permitted in the same areas as other types of housing.

Multi-family Rental Housing

All residential zones in Vernon permit multi-family rental housing.

Single-Room Occupancy Units (SROs)

Single-room occupancy units are commonly located in buildings which date from the early twentieth century. The Westside Mixed Use District Zoning Amendment (Program #8) will allow such units to be established in residential mixed-use districts along Santa Fe Avenue, which is where the greatest number of these buildings exist in Vernon.

Appendix C: Housing Resources

Accessory Dwelling Units (ADUs)/ Junior Accessory Dwelling Units (JADUs)

The City will adopt an accessory dwelling unit ordinance (Program #11) pursuant to State law to allow ADUs and JADUs to be constructed on single- and multi-family properties.

Financial Resources for Housing

For the 2021-2029 Housing Element planning period, the City anticipates funding available from the following programs:

Tenant-Based Subsidies

There are a wide variety of tenant-based subsidies that are available from government agencies to support tenants in the payment of rent for apartments on the open market. Tenant-based subsidies could be used to pay for City-owned or private housing units. Below are a few of the most important tenant-based subsidies:

- The Housing Choice Voucher Program (Section 8) provides rental assistance payments to owners of private market rate units on behalf of extremely low-income tenants.
- The Veterans Affairs Supportive Housing (VASH) program combines Housing Choice Vouchers with rental assistance for homeless veterans.
- The Los Angeles County Department of Mental Health (DMH) Shelter Plus Care grant provides subsidized housing and supportive services for individuals and families that meet the Department of Housing and Urban Development (HUD)'s definition of homelessness.
- The Family Self-Sufficiency Program provides an escrow/savings account to help welfare recipients transition off welfare.

As Vernon does not have its own housing authority, all programs are administered by larger government entities including the Los Angeles County Development Authority (LACDA).

Low-Income Housing Tax Credits

The workhorse of funding for affordable rental housing in the United States, the Low-Income Housing Tax Credit (LIHTC) program gives State and local LIHTC-allocating agencies the equivalent of approximately \$8 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. In California, these credits are distributed by the Tax Credit Allocation Committee (TCAC), which awards projects funding in the Senior and Family categories. Income levels generally range from 30% to 60% AMI.

Tax credits come in the 9% and 4% variety. The more valuable 9% tax credits have always been subject to a competitive process; however, the 4% tax credits have recently become competitive in recent years. Thus, in order for a project to be competitive, there are certain characteristics that projects must have:

- Projects must generally include a minimum of 40 to 50 units, and a maximum of 100 to 150 units, to ensure that the affordable housing developer can earn a sufficient developer fee to make the project worth its while.
- Most projects need a local match. The match may be in-kind (land) or financial.
- Locational and other scoring criteria must be met. This includes proximity to services and public transit.

Tax credits are typically used for projects which are 100% affordable; however, the regulations allow for up to 20% of units to be market-rate. There is also the California Housing Financing Agency (CalHFA) and California Public Finance Authority (CalPFA)'s 80/20 Program, which allows for tax credits to be applied to 20% or greater affordable units in large, largely market-rate developments.

Brownfields Funding

In the event that environmental site analyses determine that a housing site has contaminated soil, brownfields funding may be needed to offset remediation costs. The U.S. Environmental Protection Agency (EPA) and California Department of Toxic Substances Control (DTSC) administer several types of brownfield grant and loan programs, particularly for publicly-owned sites.

Historic Tax Credits

A federal historic tax credit of 20% is available for the rehabilitation of historic, income-producing buildings that are determined by the Secretary of the Interior to be “certified historic structures.” In 2019, the State of California also approved a 20% or 25% credit for the rehabilitation of such structures.

Private Financing

Vernon has an active real estate market which attracts private equity and debt to finance acquisition, rehabilitation and construction projects. While the financing of new market-rate housing would be new to Vernon, there is a definite pattern of banks and equity investors who have increasingly been willing to invest in housing development projects in the nearby Arts District, Boyle Heights, and Historic South Central Los Angeles.

Appendix D: Policy Evaluation

State Government Code (GC) Section 65588 calls on a local government to “...review its housing element as frequently as appropriate to evaluate all of the following: (1) The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal. (2) The effectiveness of the housing element in attainment of the community's housing goals and objectives. (3) The progress of the city, county, or city and county in implementation of the housing element.”

The development of the 2021-2029 Housing Element included an evaluation of how the City has implemented the policies of the 5th Cycle Housing Element. The table on the following pages summarizes the status, effectiveness, and appropriateness of current housing policy programs, as well as any barriers to implementation.

Status of Housing Element Policies (5 th Cycle Housing Element)			
Housing Element Policy	Result	Evaluation	Continue/Modify/ Delete
Goal H-1: Ensure that all housing units are maintained in decent, safe, and sanitary condition.			
<p><i>Housing Element Policy 1.1</i></p> <p>Continue to enforce all relevant building and zoning codes to ensure that all residential units are adequately maintained.</p>	<p>The City's Public Works Division is responsible for code enforcement activities. Due to the limited number of units in the City, staff can accurately monitor all units and has determined that all are in good repair.</p>	<p>The City has been effective in maintaining housing conditions in the City and responds to complaints as needed. By 2021, the City has renovated 24 of its 26 City-owned dwelling units and added heating, ventilation, and air conditioning (HVAC) systems. The City will modify the two remaining City-owned units within the 6th cycle planning period.</p>	<p>Code enforcement will become more important and necessary in the future as the number of housing units increase in the City.</p> <p>Continue.</p>
<p><i>Housing Element Policy 1.2</i></p> <p>Require any new or residential units undergoing a major alteration to be equipped with air filtration systems (such as HVAC systems) and sound insulation (such as dual-paned windows) to protect residents from exposure to adverse environmental conditions.</p>	<p>The City actively pursues maintenance on City-owned units, providing renovations on vacated units and repairs as needed on occupied units.</p>	<p>The City successfully completed the renovation of 24 units by 2021. Renovations included adding HVAC systems and providing insulation for sound protection and energy conservation purposes.</p> <p>The Vernon Village Park Apartments were built with MERV 13 air filters, which were state of the art in 2015, when the apartments opened.</p>	<p>The City owns many residences in Vernon. The City is fully involved with the maintenance and upkeep of the properties and will continue to provide these services on other units, as they are needed. All new and remodeled units will be required to provide HVAC systems and sound insulation protection, such as dual paned windows. Continue.</p>

Appendix D: Policy Evaluation

Status of Housing Element Policies (5 th Cycle Housing Element)			
Housing Element Policy	Result	Evaluation	Continue/Modify/ Delete
<p><i>Housing Element Policy 1.3</i></p> <p>Mitigate any residential displacement impacts occurring as a result of residential demolition.</p>	No residential units were demolished during the last planning period.	The City is committed to maintaining the existing housing units in the City.	The City is committed to mitigating residential displacement impacts, should they occur. Continue.
Goal H-2: Maintain all existing dwelling units within the City.			
<p><i>Housing Element Policy 2.1</i></p> <p>Provide for the retention of existing residential units in the City that are economically and physically sound.</p>	All units in the City were retained during the last planning period.	The 74 residential units in the City have all been determined to be in good condition.	<p>A focus of housing policy in Vernon is to preserve the existing housing stock as well as maintain safe and viable housing units.</p> <p>Continue.</p>

Status of Housing Element Policies (5 th Cycle Housing Element)			
Housing Element Policy	Result	Evaluation	Continue/Modify/ Delete
<p><i>Housing Element Policy 2.2</i></p> <p>Continue to accommodate the needs of disabled residents through the adopted reasonable accommodation procedure.</p>	<p>As of 2021, there are no assisted housing units for disabled residents in the City. According to 2015-2019 ACS 5-year Data, 11 Vernon residents have a disability.</p>	<p>Vernon Village Park Apartments, an affordable development opened in 2015, features 45 affordable units which are publicly assisted. While these units are not specifically targeted for disabled residents, the units meet standards for public buildings as defined by Chapter 11B of the California Building Code.</p> <p>21 of the City's 24 occupied rental units are rented at levels that are affordable to very low-income tenants, though the City is currently raising rents according to the Consumer Price Index (CPI) to approximate market rate rents.</p>	<p>While there is no assisted housing for disabled residents in the City that requires monitoring, the City will continue this policy.</p> <p>Continue.</p>
<p>Goal H-3: Create opportunities for the development of new housing in areas of the City that have the least potential for adverse impacts associated with established industrial uses and truck routes. Locate such new housing nearby community services.</p>			
<p><i>Housing Element Policy 3.1</i></p> <p>Implement the Housing Overlay Zone via the Zoning Ordinance and Zoning</p>	<p>The City adopted the Housing Overlay Zone in 2007.</p>		<p>Implement new housing zoning tools, such as the Westside Mixed Use District Zoning Amendment, to</p>

Appendix D: Policy Evaluation

Status of Housing Element Policies (5 th Cycle Housing Element)			
Housing Element Policy	Result	Evaluation	Continue/Modify/ Delete
map to allow for a limited amount of new housing construction.			encourage a broader level of housing construction in the City. Modify.
<p><i>Housing Element Policy 3.2</i></p> <p>Strategically locate sites for new housing so as to minimize noise, vibration, smoke, noxious gases, glare, heat, dust, odors, air pollution, and other adverse impacts associated with industrial uses, slaughtering and rendering uses, businesses that release toxic materials, and trucking and railroad facilities and routes.</p>	The Vernon Village housing development was constructed in 2015, per analysis conducted in the 5 th Cycle Housing Element that determined this was one of the two best sites for housing in the City.		<p>Sites should continue to be located in areas where industrial impacts are minimized. The City will also undertake appropriate actions to minimize impacts in areas adjacent to residentially targeted zones.</p> <p>Continue.</p>
<p><i>Housing Element Policy 3.3</i></p> <p>Encourage development of residential uses in strategic proximity to schools, recreational facilities, commercial areas, parks and other public spaces, and transit routes.</p>	The Vernon Village housing development was constructed in 2015. It is located .5 mile from schools and parks.	While locating housing close to schools is good policy for family-oriented housing, other types of housing may be better suited for proximity to other types of amenities.	Residential development should occur in proximity to amenities, but those amenities may be defined differently. Modify.
Goal H-4: Continue to promote the availability of a range in existing unit types and sizes, and equal housing opportunity in the City's housing market on the basis of age, race, sex, marital status, ethnic background, source of income, homelessness, physical disabilities, and other factors.			

Status of Housing Element Policies (5 th Cycle Housing Element)			
Housing Element Policy	Result	Evaluation	Continue/Modify/ Delete
<p><i>Housing Element Policy 4.1</i></p> <p>Prohibit discrimination in the availability of existing and new housing.</p>	<p>The City has not been advised of any discriminatory practices that have occurred in regard to the availability of housing. The City will take a proactive approach in enforcing anti-discrimination laws. The following details the extent of special needs populations in Vernon. According to the City's information from 2021 regarding the demographics of residents in their City-owned housing, there are 12 residents who are 65 years or older. According to the LAHSA 2022 Homeless Count, there are 9 homeless people living in the City of Vernon. Additionally, there are no farmworkers living in Vernon. No household in Vernon features five or more people, which is HCD's definition of a large family. Lastly, according to 2015-2019 ACS 5-Year data, there are 21 female headed households in Vernon. According to 2015-2019 ACS 5-year Data, 11 Vernon residents have a disability.</p>	<p>The City has received no complaints regarding any discriminatory actions and will continue to enforce all fair housing law.</p>	<p>Prior to 2012, the City's Zoning Ordinance did not allow the development of new housing in the City. As such, housing discrimination related to the siting of housing was not an issue. This program was updated in 2008 to address a range of fair housing concerns related to the existing housing stock, including access for persons with disabilities or special needs, providing greater access to equal housing opportunity. As more private residential units are expected to be built in Vernon, the City will remain proactive about enforcing anti-discrimination laws.</p> <p>Continue.</p>
<p><i>Housing Element Policy 4.2</i></p> <p>Address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units.</p>	<p>With the development of Vernon Village, the City of Vernon has seen an increase of 45 new affordable units within the City as of 2015. The units available range from one-bedroom units to three-bedroom units. The monthly rent for these units ranges from \$715 to \$1,336 according to the latest data from 2019. In order to qualify for these units households, need to</p>	<p>The program has been successful and more than doubled Vernon's housing stock during the 5th cycle planning period.</p>	<p>Continue.</p>

Appendix D: Policy Evaluation

Status of Housing Element Policies (5 th Cycle Housing Element)			
Housing Element Policy	Result	Evaluation	Continue/Modify/ Delete
	<p>make 60% or less of the area's median income.</p> <p>In 2013-2017, according to HUD CHAS data, the City of Vernon had no households that qualified as extremely low-income households, or households that earn below 30% of the HAMFI. In the absence of poverty data, this is the most accurate estimation for the number of extremely low-income households in Vernon.</p> <p>The following details the extent of special needs populations in Vernon. According to the City's information from 2021 regarding the demographics of residents in their City-owned housing, there are 12 residents who are 65 years or older. According to the LAHSA 2022 Homeless Count, there are 9 homeless people living in the City of Vernon. Additionally, there are no farmworkers living in Vernon. No household in Vernon features five or more people, which is HCD's definition of a large family. Lastly, according to 2015-2019 ACS 5-Year data, there are 21 female headed households in Vernon. According to 2015-2019 ACS 5-year Data, 11 Vernon residents have a disability.</p>		

Figure D-1.
Source: City of Vernon, 2021.

Effectiveness of Past Goals, Policies, and Actions for Special Needs Populations

Seniors

According to the City's information from 2021 regarding the demographics of residents in their City-owned housing, there are 12 residents who are 65 years or older. Five of these 12 residents live alone in a City-owned housing. The City of Vernon's 5th Cycle Housing Element included Policy 4.1, to prohibit discrimination in the availability of existing and new housing. The City has not been advised of any discriminatory practices that have occurred in regard to the availability of housing, related to the City's senior population. As more private residential units are expected to be built in Vernon, the City will remain proactive about enforcing anti-discrimination laws and fair housing laws. Additionally, through Housing Element Policies 1.1 and 1.2 the City successfully completed the renovation of 24 City-owned units by 2021. These units were renovated to add heating, ventilation, air conditioning, sound protection insulation, and energy conservation measures. These renovations benefit the senior population of Vernon, many of whom live in City-owned housing. Through Policy 1.1, the City will renovate the remaining two City-owned housing units within the sixth cycle.

Additionally, the City of Vernon has successfully implemented the 5th cycle's Policy 4.2, doubling Vernon's housing stock during the 5th cycle planning period, with the Vernon Village Park Apartments. The Vernon Village Park Apartments are available to households with seniors in the City of Vernon. Policy 4.2 will continue as Policy 4.3 in the 6th cycle planning period.

Persons with Disabilities

According to 2015-2019 ACS 5-year Data, 11 Vernon residents have a disability. Nine of the eleven disabled residents are 18-64 years old while the remaining two disabled residents are 65 years old or older. The City of Vernon's 5th Cycle Housing Element included Policy 4.1, to prohibit discrimination in the availability of existing and new housing. The City has not been advised of any discriminatory practices that have occurred in regard to the availability of housing, related to the City's disabled population. As more private residential units are expected to be built in Vernon, the City will remain proactive about enforcing anti-discrimination laws and fair housing laws.

The 5th cycle Element also included Policy 2.2, to continue to accommodate the needs of disabled residents through the adopted reasonable accommodation procedure. There is currently no assisted housing for disabled residents in Vernon. However, Vernon Village Park Apartments does meet standards for public buildings as defined by Chapter 11B of the California Building Code. Therefore, the Vernon Village Park Apartments are accessible

Appendix D: Policy Evaluation

to Vernon's disabled population as will all future housing build within the City of Vernon.

Large Households

According to HCD's definition, large family is often thought of as households with five or more people. No household in Vernon features five or more people. According to 2015-2019 ACS 5-year data, two-bedroom units represent the highest share of the housing stock (29 units), three-bedroom units are the second highest share (11 units), and one-bedroom units are the third highest share (4 units). There are no four- or five-bedroom units in the City of Vernon. Due to the lack of large families in Vernon, the lack of four- and five-bedroom units in the City of Vernon is appropriate.

The Vernon Village Park Apartments, built during the 5th cycle, consist of one bedroom, two bedroom, and three-bedroom units. The influx of new three-bedroom units meets the needs of lower income, large families in Vernon. The limit per bedroom for affordable projects is 1.5 persons per one bedroom, therefore, the two-bedroom units could accommodate three residents and the three-bedroom unit could accommodate approximately 4-5 residents.

Female Headed Households

According to 2015-2019 ACS 5-Year data, there are 21 female headed households in Vernon. The City of Vernon's 5th Cycle Housing Element included Policy 4.1, to prohibit discrimination in the availability of existing and new housing. The City has not been advised of any discriminatory practices that have occurred in regard to the availability of housing, related to the City's female headed households. As more private residential units are expected to be built in Vernon, the City will remain proactive about enforcing anti-discrimination laws and fair housing laws.

Additionally, Housing Element Policy 4.2 addresses the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units. The City of Vernon has successfully implemented the 5th cycle's Policy 4.2, doubling Vernon's housing stock during the 5th cycle planning period, with the Vernon Village Park Apartments. The Vernon Village Park Apartments are available to lower income female headed households in the City of Vernon. Policy 4.2 will continue as Policy 4.3 in the 6th cycle planning period.

Persons Experiencing Homelessness

According to the LAHSA 2022 Homeless Count, there are 9 homeless people living in the City of Vernon. Of this total, all 9 homeless individuals are unsheltered. Five individuals are unsheltered on the street, 1.3 individuals are unsheltered in tents, and 2.6 individuals are unsheltered in cars or vans. Housing Element Policy 4.2 addresses the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units. Policy 4.2 has been successful and more than doubled Vernon's housing stock during the 5th cycle planning period, with the Vernon Village Park Apartments. The Vernon Village Park Apartments are available to the lower income population in Vernon, including the City's homeless population. Policy 4.2 will continue as Policy 4.3 in the 6th cycle planning period.

Extremely Low-Income Households

In 2013-2017, according to HUD CHAS data, the City of Vernon had no households that qualified as extremely low-income households, or households that earn below 30% of the HAMFI. In the absence of poverty data, this is the most accurate estimation for the number of extremely low-income households in Vernon. The City of Vernon's 5th Cycle Housing Element included Policy 4.1, to prohibit discrimination in the availability of existing and new housing. The City has not been advised of any discriminatory practices that have occurred in regard to the availability of housing, related to the City's extremely low-income population. As more private residential units are expected to be built in Vernon, the City will remain proactive about enforcing anti-discrimination laws and fair housing laws. Additionally, Housing Element Policy 4.2 addresses the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units. The City of Vernon has successfully implemented the 5th cycle's Policy 4.2, doubling Vernon's housing stock during the 5th cycle planning period, with the Vernon Village Park Apartments. The Vernon Village Park Apartments are available to extremely low income and low-income households in the City of Vernon. Policy 4.2 will continue as Policy 4.3 in the 6th cycle planning period.

Appendix D: Policy Evaluation

Quantitative Objectives Progress

The 2014-2021 Housing Element identified overall objectives for housing production, rehabilitation, conservation, and preservation. These objectives represented aspirational goals for City accomplishments and exceeded the City's state obligations. (The Regional Housing Needs Assessment during the 5th Cycle was two units.) The following table summarizes actual accomplishments during the Plan period.

	2014-2021 Housing Element Objectives					
Income Category	New Construction		Rehabilitation		Conservation	
	Objective	Outcome	Objective	Outcome	Objective	Outcome
Extremely Low- and Very-Low Income	2	27	0	5	0	29
Low-Income	47	17	0		0	
Moderate -Income	0	0	7		31	
Above Moderate -income	0	1	0		0	
Total	49	45	7	5	31	26

Figure D-2.

Appendix E: Housing Programs Detail

The programs that will be effective in the implementation of the Housing Element policies are described in the sections that follow.

Program 1: Maintenance of City-Owned Residences

Detail. The City owns 26 housing units in Vernon, all but three of which are rented. The City is responsible for the maintenance and upkeep of these units, and management is overseen by the City's Housing Commission. All City-owned units were determined to be in good repair. The City of Vernon recently renovated 24 of their 26 City-owned units. The remaining two units, though they are in good, habitable condition, will be renovated due to age over the next eight-year planning period. The City continues to provide maintenance to these units, thus ensuring upkeep for Vernon's City-Owned housing stock.

City's Role in Implementation. The Department of Public Works is responsible for coordinating the maintenance of City-Owned residences. The day-to-day oversight of the program is under the direction of the Director of Public Works.

Source of Funding. General Fund.

2021-2029 Program Objectives. To renovate the final two unrenovated City-Owned residences. The City will continue to provide maintenance to City-Owned residences over the 6th cycle planning period.

Agency Responsible for Implementation. The Department of Public Works is responsible for coordinating the maintenance of City-Owned residences under the supervision of the Housing Commission.

Implementation Schedule. The Department of Public Works will continue to provide maintenance to City-Owned residences over the 6th Cycle planning period.

Program 2: Vernon Code Enforcement Program.

Detail. Of the 48 non-City owned units located in Vernon, none were determined by the City to be in need of substantial rehabilitation. Forty-five of these units belong to the Vernon Village Park Apartments, an affordable family development which was completed in 2015. Due to the limited number of privately owned units in the City, a code enforcement program would have limited application at this time. However, it is nonetheless imperative that residential units be adequately maintained for health, safety, and aesthetic concerns. Public Works staff is active in the community and will enforce the City's code to eliminate and prevent unsafe conditions in residential units. Public Works staff responds to reports of code violations within the week that they are reported and enforces applicable laws to ensure the safety and preservation of all housing units within the City.

As additional privately-owned residential units are built in Vernon the need for code enforcement will increase. At the conclusion of the 6th Cycle, the City will review the need to dedicate additional staff time to code enforcement.

City's Role in Implementation. To enforce the City of Vernon's building code and ensure the safety and preservation of all housing units in Vernon.

Source of Funding. General Fund.

2021-2029 Program Objectives. The City continues to inspect privately owned residential units on an as-needed basis.

Agency Responsible for Implementation. The Public Works Department Building Division of the City of Vernon. Responsibility for this program falls under the Public Works Director.

Implementation Schedule. The Building Division of the Public Works Department Code will continue to implement the program over the 6th Cycle planning period.

Program 3: Preservation of At-Risk Housing.

Detail. There is one affordable family housing development in the City of Vernon funded through Low-Income Housing Tax Credits (LIHTC). This development, the Vernon Village Park Apartments, is not at risk of conversion to market rate housing since the development was completed in 2015. Vernon Village Park Apartments will not be eligible to convert to market rate housing until 2070.

The Vernon Village Park Apartments are on property owned by the City and ground leased to Meta Housing Corporation, a developer of affordable housing and operated by Solari Enterprises, a full-service property management organization specializing in multifamily affordable housing. Because the development is owned and operated by entities that prioritize affordable housing, they have a small, but not negligible, risk of converting to market rate in the far future. Under this program, the City of Vernon will continue to monitor all units considered at risk of conversion to market rate units in the future. The City of Vernon continues to also assist property owners in maintaining the affordability of these units through grants and other means. Finally, the City will require the timely notification of tenants in the event the owners intend to convert the affordable units to market-rate units.

Source of Funding. General Fund.

2021-2029 Program Objectives. To continue to monitor the status of the existing and any new affordable housing units.

Agency Responsible for Implementation. The responsible agency is the City of Vernon's Public Works Department, led by the Public Works Director.

Implementation Schedule. The program will be implemented throughout the 6th Cycle.

Program 4: Housing Opportunities for Residents with Special Needs

Detail. The Fair Housing Act, as amended in 1988, requires that cities and counties 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 adopted procedures for housing for persons with disabilities and continues to provide information to residents through the City’s website. During the 6th cycle, the City will add these reasonable accommodation procedures into the Municipal code.

Source of Funding. General Fund.

2021-2029 Program Objectives. To continue to implement its reasonable accommodation procedure on an as-needed basis. Add reasonable accommodation procedures into the Municipal code.

Agency Responsible for Implementation. The responsible agency is the City of Vernon’s Public Works Department, led by the Public Works Director.

Implementation Schedule. Necessary reasonable accommodation procedures will be added into the Municipal Code by the end of 2023. The reasonable accommodation procedure will be implemented throughout the 6th Cycle.

Program 5: Priority Water and Sewer Services.

Detail. In accordance with Government Code Section 65589.7, after the Vernon Housing Element is adopted by City Council, a copy will be immediately delivered to all public agencies or private entities that provide water or sewer services to properties within Vernon.

Source of Funding. General Fund.

2021-2029 Program Objectives. To deliver, in timely fashion, a copy of the 6th Cycle Housing Element to public agencies or private entities that provide water and/or sewer services within Vernon.

Agency Responsible for Implementation. The responsible agency is the City of Vernon's Public Works Department, led by the Public Works Director.

Implementation Schedule. The program will be implemented by the end of 2022.

Program 6: Environmental Safety Enforcement.

Detail. The City continues to enforce health and environmental safety regulations of industrial businesses through its Health and Environmental Control Department (HECD) which can help protect nearby residents. The Public Works Department will inform HECD of any residential development applications, construction projects, and certificates of occupancy extended in the City so that HECD can ensure compliance of neighboring businesses with applicable regulations in their operations.

Source of Funding. General Fund.

2021-2029 Program Objectives. To enforce health and environmental safety regulations for industrial businesses operating near residential uses.

Fair Housing Metric. Engagement and compliance review conducted of 75% of businesses adjacent to new residential developments prior to certificate of occupancy.

Agency Responsible for Implementation. The responsible agency is the City of Vernon Health and Environmental Control Department, led by the Director of Health.

Implementation Schedule. The program will be implemented as residential projects are permitted and throughout the 6th Cycle.

Program 7: Equal Housing Opportunity Program.

Detail. The City shall take meaningful actions to address significant disparities in housing needs and in access to opportunity 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. As the number of privately-owned housing units increases in Vernon, the City will take actions including:

- Publish on the City’s website clear information warning entities that would potentially discriminate about the enforcement of fair housing law;
- Provide a staff point of contact to refer housing-related complaints to the Housing Rights Center,
- Ensure environmental hazards are not disproportionately concentrated in low-income communities of color.
- Explore offering training to property owners and managers regarding responsible management of environmental hazards. Assist in outreach to tenants to inform them of their rights to live in habitable housing regardless of income, race, or immigration status.
- Continue a code enforcement program that holds property owners accountable, when necessary.

Source of Funding. General Fund and other eligible funding sources.

2021-2029 Program Objectives and Fair Housing Metrics. To establish a point of contact to refer fair housing complaints to the Housing Rights Center. To continue a code enforcement program that holds property owners accountable, when necessary. To publish on the City’s website clear information warning entities that would potentially discriminate about the enforcement of fair housing law. To provide fair housing and environmental hazard education to managers of each new housing development in the City. Conduct fair housing outreach to 75% of tenants in the City

Agency Responsible for Implementation. The Public Works Department. Responsible party is the Public Works Director.

Appendix E: Housing Programs Detail

Implementation Schedule. All of the actions associated with this program will be implemented within a year of the first new private residential development lease-up date. After the program begins it will continue throughout the planning period.

Program 8: Westside Mixed Use District Zoning Amendment.

Detail. The City of Vernon is preparing a Zoning Amendment for the Westside of the City. This Zoning Amendment seeks to increase the residential population in order to increase access to proportionally allocated Federal and State funding, to strengthen the City's governance by providing more voters and candidates for elected office, and to help meet regional housing needs. It will also diversify and reorient the Westside's land uses to take advantage of changes in the economic landscape of Southern California.

The Zoning Amendment will define focused areas where residential uses will be permitted by-right. Development standards and procedures in these zones will allow multifamily residential development in new multistory and adaptively reused buildings. The Zoning Amendment will feature a form-based approach which will allow heights of 3-7 stories in certain areas and will accommodate densities of at least 50 dwelling units per acre. The Zoning Amendment will rezone a minimum of 16 acres of land within the westside of Vernon. Both housing sites in this Element's inventory are included within the Westside Mixed Use District Zoning Amendment area. These two sites are subject to Government Code 65583.2, Subdivisions H and I, including requirements for by-right approval and minimum densities and development standards. The City will ensure development standards will achieve maximum densities and revise as necessary.

The zoning amendment will also permit or streamline the development of retail businesses, creative offices, production retail outlets, artisan and craft businesses, live/work residences, etc. A modest requirement for nonresidential space as a part of each development will be included. Thus, the amendment will increase amenities available to local residents and workers, in response to the identified fair housing issues (Table H-2) of some residences not being located close to commercial amenities, and the lack of access to jobs and education for people with disabilities and people who do not own cars.

The EIR for the Westside Mixed Use District Zoning Amendment found no deficits in the infrastructure services required to accommodate new residential development on the Westside. Street improvements, such as complete streets interventions and truck restrictions on key residential corridors, will be evaluated for feasibility during the sixth cycle through Program 21 (Environmental Enhancements). Additionally, the Westside Mixed Use District Zoning Amendment will permit transitional and supportive housing wherever multifamily housing is permitted, plans to permit low barrier navigation centers wherever multifamily housing is permitted, permit manufactured housing in all residential zones, and designate the Santa Fe North Zone for by-right emergency shelters of up to 40 beds, along with complying with all other state

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requirements. Emergency shelters of up to 40 beds will be permitted by right in the Santa Fe North zone once the Zoning Amendment is adopted. Zoning standards for emergency shelters in the Santa Fe North zone will be compliant with AB 2339, including the elimination of parking standards or requirement to provide only employee parking, and exemption from design review.

In order to ensure a healthy environment for residents, and address the identified fair housing issue (Table H-2) of high level of pollution burden and health risks, the Zoning Amendment will also establish health requirements for residential buildings, including minimum separation requirements from facilities with heavy truck use and/or modified development standards to mitigate the noise and air quality impacts of these neighboring facilities, buffering standards, and high efficiency air filter requirements.

Source of Funding. General Fund.

2021-2029 Program Objectives. To adopt a Zoning Amendment for the Westside of the City which permits by-right residential uses and by-right emergency shelters of up to 40 beds within the Santa Fe North zone.

Fair Housing Metrics. At least 100 new residential units constructed, including 9 lower-income units to satisfy the City's RHNA. At least 10,000 square feet of new commercial amenities and job-producing uses will be constructed within the Westside Mixed Use District. All new residential buildings will comply with health standards.

Agency Responsible for Implementation. The responsible agency is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The Zoning Amendment is currently under development and will be adopted by July 2023.

Program 9: Mixed-Use Development Marketing

Detail. After the City of Vernon completes the Westside Mixed Use District Zoning Amendment the City will initiate a Mixed-Use Development Marketing program to inform the developers of the new opportunity that will exist on the Westside of the City. This marketing program aims to market the Westside of Vernon as a hybrid industrial, mixed-use district which welcomes residential development.

This program will create a municipal development coordinator function who will be responsible for marketing the new Westside of Vernon, generating interest in residing and conducting business on the Westside. The marketing program will have two prongs: one targeted at the development community (property owners, real estate agents and developers), pointing out that mixed-use development, including multifamily residential, commercial and light industrial, are welcome in areas of the Westside, and can be quite profitable; and one targeted at potential residents and customers, raising the profile of the area.

Development coordinator responsibilities include creating a comprehensive branding program which will include putting up a gateway sign reflecting the new image of the Westside, holding events such as art tours which will highlight local Westside businesses and generate a buzz for the new Westside, and advertising and marketing the new Westside in selected publications.

City's Role in Implementation. The City of Vernon Public Works Department is responsible for the implementation of this program.

Source of Funding. General Fund.

2021-2029 Program Objectives. To identify a development coordinator who will prepare a marketing plan for the Westside Mixed Use District Zoning Amendment.

Agency Responsible for Implementation. The responsible agency is the Public Works Department. The responsible parties are the Development Coordinator and the Public Works Director.

Implementation Schedule. The development coordinator function will be created, and the marketing plan initiate implementation by mid-2023. The marketing plan will continue over the sixth cycle planning period.

Program 10: Medium-Density Residential Zoning

Detail. A large amount of housing in the City of Vernon is situated on land not zoned for residential uses. This program includes adopting a zoning designation to make all existing housing conforming. The zoning designation may take the form of an overlay zone or a re-zone.

In addition, the program will allow a few units to be built per property. In most cases, the new residential zoning capacity of the housing sites will be larger than the number of existing residential units on the sites. The program will also permit manufactured housing in the same areas as other types of housing.

Source of Funding. General Fund.

2021-2029 Program Objectives. To adopt a new medium-density residential zoning designation in the zoning code and map. Permit manufactured housing in the same areas as other types of housing.

Agency Responsible for Implementation. The responsible agency is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The program will be implemented by the end of 2024.

Program 11: Accessory Dwelling Unit Ordinance.

Detail. The City of Vernon will develop and adopt an ADU ordinance within the sixth cycle planning period. The ADU ordinance will be in conformance with State law and encourage accessory dwelling unit construction. The changes will be advertised on the City's website and printed handouts will be prepared and provided at the Planning counter.

Funding permitting, the City will also seek to encourage the creation of affordable ADUs through partnerships with entities that can make low-interest loans or other types of financial assistance.

The City will explore monitoring the production and affordability of ADUs in the City through regular communication with property owners.

Lastly, in the event the City receives an ADU application which is not subsequently followed up on by the property owner, the City will reach out to the property owner to gain information about why the property owner was unable to build their ADU. This outreach would take the form of a with a windshield tour and phone call to each property owner who submitted an ADU application but did not follow through on the permitting process until Certificate of Occupancy. The results of this research will inform further actions that can be undertaken to address physical, financial, or informational boundaries in the ADU process.

Source of Funding. General Fund (zoning implementation), and other eligible funding sources.

2021-2029 Program Objectives. To develop, adopt, and implement the ADU Ordinance in accordance with State Law. Evaluate incentives for creating affordable ADUs. Monitor the production and affordability of ADUs in Vernon on a biennial basis. Will be establishing incentives and partnerships for ADUs by mid 2024.

Agency Responsible for Implementation. The responsible agency is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The ADU Ordinance will be developed and adopted by mid-2023. Monitor the production and affordability of ADUs in Vernon on a biennial basis, starting at the end of 2023.

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Program 12: Caretaker Housing

Detail. Caretaker housing is generally occupied by the owner of an industrial property or their employee and serves the purposes of providing housing, security, and care to the industrial property during off hours. Many cities allow one or more caretaker housing units to be constructed and occupied on the sites of industrial establishments. These units often take the form of a second-story apartment unit or detached modular home.

Businesses in Vernon have with regularity expressed interest in permitting caretaker housing units to be constructed on-site. Furthermore, code enforcement actions have revealed that several properties in Vernon provide housing illegally today, for example by parking inhabited RVs on the property. The City will adopt a code amendment to allow caretaker housing to be constructed on industrial properties in appropriate locations throughout the City, as long as such housing does not injure the health and welfare of residents or other industrial users.

Source of Funding. General Fund.

2021-2029 Program Objectives. To adopt a zoning code amendment to permit up to three caretaker housing units to be constructed per industrial facility in appropriate locations.

Agency Responsible for Implementation. The responsible agency is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The code amendment will be adopted by 2025.

Program 13: Housing Lottery

Detail. Since the institution of the City’s good governance reforms in the early 2010’s, the City has used a lottery system to guide the lease-up of vacant City-owned residential units. The City conducts quarterly marketing of housing opportunities through its website, Craigslist, postings at City Hall, and a local newspaper. In addition, the Vernon Police Department and Fire Department advertise housing availability to its employees. Interested applicants file interest forms which are valid for one year. (The City currently has 54 interest forms on file.) When a housing unit opens up, the City asks for confirmation of interested parties’ interest, and conducts the lottery. There is a priority for First Responders; if less than four units are currently occupied by Vernon First Responders, any First Responder applicants will be ranked higher than other applicants.

Source of Funding. General Fund.

2021-2029 Program Objectives. To continue to administer the housing lottery system in the selection of tenants for City-owned housing units.

Agency Responsible for Implementation. The Vernon Housing Commission, in conjunction with the City Clerk’s office, are responsible for this program. The responsible party is the City Clerk.

Implementation Schedule. Advertisement for Notices of Availability will be conducted quarterly, and lotteries held as vacancies arise, throughout the 6th Cycle.

Program 14: Housing Grant Application Working Group.

Detail. The City desires to seek out grants that can expand revenue for important housing programs while providing more financial flexibility for General Fund revenues. As opportunities arise, the City will form an interdepartmental working group to identify unmet housing needs and focus on appropriate regional grant opportunities.

Source of Funding. General Fund.

2021-2029 Program Objectives. To regularly monitor and seek grant funds to advance the City's housing objectives.

Agency Responsible for Implementation. The responsible agencies are the Public Works Department, City Administration, and the Finance Department. The responsible party is the Public Works Director.

Implementation Schedule. The City will annually monitor and seek grant funds to advance the City's housing objectives over the sixth cycle planning period.

Program 15: Employee Workforce Housing

Detail. The City of Vernon is a large job center; however, at this time very few Vernon workers are able to work and live in Vernon. Some Vernon workers are likely to live in Vernon if given the opportunity. Employers that can provide on-site and local affordable housing for its workers can reduce transportation costs, commute time, and improve quality of life while improving job retention rates. The City will cooperate with business owners that seek to develop employee housing in the City. This may include assisting in obtaining financing and identifying means for employee housing to be managed. Program eligibility, equity, and other issues would need to be explored to provide a template that sets the stage for a housing project that advances this concept.

In the course of its regular business, for example, while extending business licenses and in meetings with business owners, the Public Works Department will inform local business owners of their ability to develop employee workforce housing for their employees.

At the same time that the City encourages employee housing, it will also ensure that such housing does not constitute an overconcentration of residents employed by any one business in the electorate of the City.

Source of Funding. General Fund.

2021-2029 Program Objectives. To cooperate with businesses who seek to establish employee workforce housing in the City.

Agency Responsible for Implementation. The responsible agencies include the City of Vernon Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The program will be implemented throughout the 6th Cycle.

Program 16: City-Owned Housing Disposition Study

Detail. Prior to the City's good governance reforms, tenancy in City-owned housing was managed in a questionable fashion. To provide long-term protection against any repetition of these practices, the City will consider divesting itself of its 26 housing units.

The City will undertake a study to identify and evaluate options relating to the future management of City-owned housing. Options to be considered include:

- Continuing to operate City-owned housing with the same processes as exist today to ensure transparency and fairness in the occupancy of housing units.
- Selling properties, including the exploration of a first-time homebuyer down payment assistance program, and first right of offer provided to current tenants to enable them to build equity. As a variation, the City could sell interest in the structures, while retaining long-term control over the land.

The study would also address questions of legal and financial constraints to all options and provide guidelines for the appropriate prices at which units could be disposed.

Source of Funding. General Fund.

2021-2029 Program Objectives. To undertake a study to identify and evaluate options relating to the future of City-owned housing.

Agency Responsible for Implementation. The responsible agency is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The disposition study will be undertaken by 2027.

Program 17: Review and Removal of Governmental and Nongovernmental Constraints

Detail. This program is an existing program that will be continued through the 2021-2029 Planning Period. This program involves the continued comprehensive review of the City's Zoning Ordinance to identify undue constraints to the production of housing. In the event a constraint is identified, the zoning requirements will be revised. Specific tasks include:

- The City will adopt a checklist and a written procedure to comply with the SB 35 Streamlined Ministerial Approval Process to process applications using this State law.
- The City will amend the zoning ordinance to permit residential care facilities serving seven (7) or more persons in all residential zones objectively and similar to other residential uses in the following residential zones within the Westside Mixed Use District Zoning Amendment: MU-CC, MU-S, and MU-N. "Create a definition of small employee housing (6 or fewer residents) within the Zoning Code and permit small employee housing within all zones where single-family residential uses are permitted.
- Per AB 101, the City will review its zoning ordinance and make revisions if necessary to allow low barrier navigation centers for the unhoused per Government Code 65660-65668.
- Permit by-right transitional and supportive housing within the entire City where multifamily and mixed-uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651.
- Create standards for street widths within residential subdivisions and establish additional standards for on and off-site improvements, as deemed necessary through a review.
- Provide all zoning and development standards, and fees for each parcel with its jurisdictional boundaries on the City's website.
- Amend or adopt the Density Bonus Ordinance to comply with State Density Bonus Law.
- Eliminate or modify parking requirements for the Emergency Shelter Overlay Zone to comply with AB 2339.

Source of Funding. General Fund and other eligible funding sources.

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2021-2029 Program Objectives. The City of Vernon will adopt ordinances modifying the zoning ordinance to remove the constraints and State law unconformities addressed above.

Agency Responsible for Implementation. The Lead Agency for the program's implementation is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. All code updates will be made by the end of 2023.

Program 18: Energy Conservation

Detail. The City will review the City's Zoning Ordinance and subdivision requirements, as well as other applicable codes, to promote energy conservation in housing rehabilitation and in the construction of new housing. This program will supplement existing City efforts in the enforcement of the State's construction codes requiring energy efficiency in new construction. This program will ensure that developers and/or architects incorporate certain State-mandated energy and water conserving equipment in new development. The City's website will be expanded to include a section that will refer users to a wide range of initiatives from other energy and water providers that will be effective in helping to conserve these resources. The programs will include rebates from other energy providers for energy conserving refrigerators, water heaters, and other household appliances. The key elements of this program include the following:

- The City will encourage and support cost-effective energy technologies (passive solar space heating and cooling and water conservation) in the review of new residential development.
- The City's website will be updated to publicize the availability of the various rebate programs and tax incentives that will reduce the cost of installing energy-saving devices.
- The City will review the Zoning Ordinance to ensure that there are no requirements that are overly restrictive concerning the installation of solar panels. The City will then amend the Zoning Ordinance to ensure that solar panels are permitted in all Zone Districts.
- The City shall promote water conservation (e.g., drought-tolerant landscaping, water conserving plumbing fixtures) in the review of new development. No additional funding and/or staffing will be required or are anticipated with this program's continued implementation.

City's Role in Implementation. The Public Works Department is solely responsible for the implementation of this program.

Source of Funding. General Fund and other eligible funding sources.

2021-2029 Program Objectives. The City of Vernon Public Works Department will ensure the appropriate Zoning Ordinance section related to energy conservation requirements are updated so they conform to State Law. The City

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will be proactive in advertising energy conservation programs through handout materials that will be available at the public counter through the City's web page, social media outlets, and through periodic advertisements in the City newsletter.

Agency Responsible for Implementation. The Lead Agency for the program's implementation is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The program will be implemented during the duration of the 6th Cycle planning period.

Program 19: Extremely Low-Income, Very Low-Income, and Low-Income Housing Program.

Detail. This program targets both “for-profit” and “non-profit” developers so they may play a larger role in the provision of affordable housing in Vernon. Their role is especially crucial following the elimination of redevelopment. The City provides regulatory incentives and financial assistance to developers to complete both ownership and rental housing for very low-, low-, and moderate-income households. Under this program, the City intends to maintain, on an ongoing basis, a vacant and underutilized residential sites inventory and provide sites information to interested developers; and to provide technical assistance for lower-income developments to housing providers. The City will apply for financial incentives through HOME funds (which are obtained through the Los Angeles County Development Authority’s competitive process) and regulatory incentives, including but not limited to density bonuses and flexible development standards, to private developers to increase the supply of affordable housing. If there are any housing developments on City-owned land which are currently in the pipeline, prior to the approval stage, these developments will be examined to determine how and whether affordable housing can be incorporated, and future RFPs for development on City-owned land will explicitly encourage affordable housing.

In addition to promoting new housing for very low-income, low-income, and moderate-income households, the City is committed to identifying strategies that promote housing opportunities for extremely low-income households. This income group represents those individuals and/or households that have annual incomes of less than 30% of the County median. These individuals are essentially working at minimum wage levels. Individuals in this group are typically forced to live with family members or others (if that is an option) or to share housing (often resulting in overcrowding). Because of the challenges associated with providing housing opportunities for extremely low-income households, this subset consists of the implementation elements:

- The City work with developers of SRO housing to set-aside a specified number of housing units in return for density bonus concessions.
- The City will aggressively utilize regulatory incentives, including but not limited to density bonus concessions to encourage private developers to increase the supply of affordable housing for extremely low-income individuals and/or households.
- The City will encourage the development of Accessory Dwelling Units as a means to provide housing for extremely low-income individuals or households, including but not limited to exploring

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financial incentives for affordable ADUs as described in Program 11.

- Maintain compliance with the Surplus Land Act throughout the 2021-2029 Housing Element period.

A third component of this affordable housing program is geared towards those individuals that not only need affordable housing but also have special housing needs related to a developmental disability. The State Department of Developmental Services (DDS) administers developmental disabilities programs through regional centers. The Frank D. Lanterman Regional Center and the South Central Los Angeles Regional Center serve the City of Vernon. This program element consists of the following components:

- The City will encourage the retrofitting of housing for individuals with developmental disabilities.
- The City will work with the two Regional Centers to implement an outreach program that informs families in Vernon regarding housing and services that are available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the City's website, and providing housing-related training for individuals/families through workshops.
- The City will work with the Regional Centers to identify funding sources that can address the housing needs of developmentally disabled persons, including any potential funding sources for the construction of new housing for developmentally disabled residents.

A fourth component of this affordable housing program is geared towards physically disabled residents and seniors. Physically disabled residents and seniors often need special accommodations in their homes. Under this program, the City will pursue available funding sources to assist in the retrofitting of housing for disabled residents and seniors and new construction of universally designed housing units.

As the fifth component of this affordable housing program the City will explore opportunities for adaptive reuse of existing non-residential structures into residential uses for special needs groups, including extremely low-income households.

A sixth component of this affordable housing program is geared towards female headed households, many of which are lower income. Many female headed households need to live in affordable housing in order to avoid being rent

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burdened or severely rent burdened. Under this program, the City will pursue available funding sources to assist in the new construction of affordable, family size housing units.

A seventh component of this affordable housing program is geared toward Vernon's homeless population. Homeless residents in Vernon are in need of permanent supportive housing units. Under this program, the City will pursue available funding sources to assist in the new construction of permanent supportive housing units.

City's Role in Implementation. The Public Works Department is solely responsible for the implementation of this program.

Source of Funding. General Fund and other eligible funding sources.

2021-2029 Program Objectives. The City will pursue available funding sources to assist in the development of lower income housing, including extremely low-income housing. The City apply for State and Federal assistance including, but not limited to CDBG and HOME funding. The City will send out an annual communication to developers of affordable and special needs housing discussing available funding sources to assist in the development of lower income, including extremely low-income housing and housing suitable for special needs populations. The City will explore opportunities for adaptive reuse of existing non-residential structures into residential uses for special needs groups, including low-income households.

Agency Responsible for Implementation. The Lead Agency for the program's implementation is the Public Works Department. The responsible party is the Public Works Director.

Implementation Schedule. The program will be implemented during the duration of the 6th Cycle planning period. The communication to developers will be sent out annually, starting by the end of 2023.

Program 20: Small Site Development Facilitation and Lot Consolidation

Detail. The Westside Mixed-Use District includes many smaller sites which are to be zoned for by-right mixed-use development. In order to facilitate the development of these sites as small sites and/or as consolidated lots, the City of Vernon will provide development incentives including but not limited to the following, as necessary:

- Evaluating consolidated development sites together, even when proximate but not adjacent, so that required project elements such as nonresidential space, open space and parking can be provided in the most efficient location.
- Granting more flexible height and parking standards, when affordable housing is included.
- Supplement land area of small sites by repurposing the public right-of-way, for example taking parking lanes for open space, or vacating unnecessary rights-of-way.

These incentives will be specifically explored for the parcels at 5592-5600 South Santa Fe Avenue which are included in the sites inventory.

The City will also publish the building and parcel analyses conducted as a part of the Westside Specific Plan Baseline Studies (January 2021) on its website. These analyses identified high-quality candidate parcels for redevelopment and adaptive reuse. The City will also contact owners of contiguous vacant and underutilized sites to introduce the idea of parcel consolidation, explaining Westside Mixed Use District standards and potential incentives under this program to make site assembly feasible, and offering technical assistance.

The City will monitor the effectiveness of these strategies to address the housing needs of lower-income households and adopt alternative strategies as needed to ensure effectiveness of the program.

City's Role in Implementation. The Public Works Department is responsible for the implementation of this program.

Source of Funding. General Fund and other eligible funding sources.

2021-2029 Program Objectives. The City of Vernon will offer development incentives as necessary to accommodate redevelopment on small sites/sites requiring consolidation within the sites inventory. The City will publish building and parcel analyses identifying candidate parcels for redevelopment on its website. The City will contact owners of underutilized sites to introduce the idea of parcel consolidation.

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Agency Responsible for Implementation. The Lead Agency for the program's implementation is the Public Works Department. The responsible party is the Public Works Director, with support from the Development Coordinator (see Program 9).

Implementation Schedule. The program will be implemented throughout the duration of the 6th cycle period; however, incentives will be discussed with the property owners of 5562-5600 S Santa Fe Avenue, and building and parcel analyses will be posted on the City's website by 2023.

Program 21: Environmental Enhancements.

Detail. The City will evaluate the feasibility of street improvements for streets in Vernon with residential uses. If the City finds certain improvements feasible, the City will seek eligible sources of funding. Street improvements to residential streets would improve the pedestrian experience for Vernon’s residents.

Source of Funding. General Fund and other eligible funding sources.

2021-2029 Program Objectives. To evaluate the feasibility of street improvements for streets with residential uses in Vernon.

Agency Responsible for Implementation. The responsible agencies are the Public Works Department and the Finance Department. The responsible party is the Public Works Director.

Implementation Schedule. The City will annually evaluate the feasibility of street improvements for streets in Vernon with residential uses throughout the sixth cycle.

Program 22: Environmental Justice.

Detail. Through this program the City commits to a number of actions to address environmental justice concerns:

- First, the City will complete a General Plan Environmental Justice Element by the end of 2027.
- Second, the City will continue to coordinate with the California Department of Toxic Substances Control (DTSC) on the Exide Residential cleanup for residential units within the City. As part of the Exide Residential cleanup the DTSC oversees the investigation and cleanup of the residential properties, schools, parks, daycare, and childcare centers within the approximately 1.7-mile radius area of the former Exide Technologies (Exide) facility in Vernon, California.
- Third, the City will undertake efforts to increase transit ridership by implementing the Transportation Demand Management (TDM) standards within the Westside Mixed Use District Zoning Amendment, which require informing residents and tenants of new developments of transit options.
- Fifth, the City will continue to cooperate with Metro, the Army Corps of Engineers and other agencies on the creation of the LA River Bike Path.
- Sixth, the City will hold one meeting every two years at the affordable Vernon Village Park Apartment for residents to inform them of City services and inform them of opportunities to become involved with municipal decision making, including the Environmental Justice Element.

Source of Funding. General Fund and other eligible funding sources.

2021-2029 Program Objectives. To create an Environmental Justice Element. To collaborate with DTSC on Exide Residential cleanups for Vernon residences. To provide education to residents on affordable transit options. To collaborate on the creation of the LA River Bike Path. To conduct biannual outreach to Vernon Village Park Apartment residents to inform them of City services. To implement the TDM standards.

Agency Responsible for Implementation. The responsible agencies are the Public Works Department. The responsible party is the Public Works Director.

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Implementation Schedule. The City will biannually conduct outreach to Vernon Village Park Apartment residents. The City will complete an Environmental Justice Element by the end of 2027. The City will work with DTSC annually on Exide Residential cleanups, as needed. The City will implement TDM standards as a matter of extending certificates of occupancy to new developments within the Westside Mixed-Use districts starting in 2023. The City will collaborate on the LA River Bike Path throughout the sixth cycle.

Appendix F: Summary Of Recent Housing Legislation

The 2021-2029 Housing Element reflects the evolving legislative priorities of the California Legislature and Senate. This included a number of housing-related bills in 2020 that addressed streamlining housing approvals, affordability issues, and responses to the COVID-19 pandemic of 2020-2021.

COVID-19 Responses

- Assembly Bill (“AB”) 3088 – COVID-19 Emergency Relief (Chiu) protected tenants from evictions between September 1, 2020, and January 31, 2021, due to COVID-19 related financial hardship provided the tenant pays at least 25% of the rent due to the landlord. Landlords can eventually recover all unpaid rent from the tenant in small claims court, but it can never be the basis for an eviction. On January 29, 2021, Governor Newsom extended the eviction moratorium through June 30, 2021.
- AB 1561 – Housing Entitlement Extension (Garcia) extended the period for the expiration, effectuation or utilization of a housing entitlement that was in effect on March 4, 2020, and will expire before December 31, 2021, by 18 months. Housing entitlements include discretionary and ministerial approvals from a state or local agency, but exclude development agreements, a preliminary application under SB 330, and an application for a SB 35 permit.

Density

- AB 2345 – Density Bonus Law (Gonzalez and Chiu) allows local jurisdictions the authority to grant additional concessions and incentives above and beyond what is currently provided under state Density Bonus Law, including the increase of the maximum density bonus to up to 50% based on an updated sliding scale of housing affordability. The legislation also includes a uniform method to measure the distance between a major transit stop and a project location to maximize the number of eligible properties within a half-mile radius of a major transit stop. The bill also reduces maximum parking requirements for eligible projects and eliminates parking requirements for 100% affordable projects and senior housing projects that meet specified criteria.

Streamlining Housing Approvals

- AB 1851 – Parking Lot of Religious Institutions (Wicks) prohibits a local jurisdiction from denying a housing development project proposed by a religious institution, or a developer working with a religious institution, solely on the basis that the project will reduce the total number of parking spaces available at the place of worship, provided that the total reduction does not exceed 50% of existing parking spaces. The bill authorizes a local jurisdiction to require up to one parking space per unit for a religious institution affiliated housing project.
- AB 3182 – Right to Rent in HOAs / ADU Permits (Ting) prohibits a Homeowners Association from adopting or enforcing a provision that restricts the rental or lease of a house or condo, except that the HOA may restrict short-term rentals of 30 days or less. This legislation deems a permit application for the creation of an accessory dwelling unit or junior accessory dwelling unit approved if the local agency has not acted upon the completed application within 60 days.
- AB 831 – Modifications and Clarifications to SB 35 (Grayson) amends SB 35, which allows some housing and mixed-use projects to qualify for a streamlined, ministerial CEQA- exempt approval process if the project meets the local government's objective zoning and design review standards, provides a specific minimum number of affordable housing units, agrees to pay prevailing wages, and meets other qualifying criteria. It also helps ensure that cities do not use post-entitlement review processes to avoid the intent of SB 35's ministerial approval process.
- AB 168 – Tribal Resources (Aguiar-Curry) requires local governments to conduct a scoping consultation with Native American Tribes before processing a SB 35 application to determine if the proposed development could impact a potential tribal cultural resource. The bill makes a project ineligible for streamlining under SB 35 if the Native American Tribe does not agree that no potential tribal cultural resource would be affected by the proposed development. This bill took effect on September 25, 2020.
- SB 1030 – Housing Omnibus (Wiener) provides minor technical fixes to existing housing legislations. It revised the definition of “deemed complete” under the Housing

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Accountability Act (SB 330) to include the submission of a completed application if the applicant has not submitted a preliminary application. This bill took effect on September 25, 2020.

- AB 3308 – Teachers Housing (Gabriel, Mullin, and Quirk-Silva) permits school districts to restrict occupancy on land owned by school districts to teachers and school district employees of the school district that owns the land. This includes permitting school districts and developers in receipt of tax credits designated for affordable rental housing to retain the right to prioritize and restrict occupancy on land owned by school districts to teachers and school district employees.

Planning

- AB 725 – Housing Element Location Designation Requirements (Wicks) imposes new requirements for city housing element updates that are required to be prepared under the already underway 6th Cycle of the Regional Housing Needs Assessment (“RHNA”) process. AB 725 requires that cities designate sites to meet at least 25% of a jurisdiction’s share of the regional housing need for moderate-income housing, and at least 25% of a jurisdiction’s share of the regional housing need for above moderate-income housing. For these sites, zoning that allows at least 4 units of housing, but not more than 100 units per acre of housing, is required. This bill will take effect on January 1, 2022.

CEQA

- SB 288 – New CEQA Exemption for Sustainable Transportation Projects (Weiner) creates a new CEQA exemption for certain classes of qualifying transit-related projects until January 1, 2023. To qualify, the project must be carried out by a public agency, be located in an urbanized area and within an existing public right-of-way, not require demolition of affordable housing units, be completed by skilled and trained workforces, and not entail adding physical infrastructure that would increase new automobile capacity.

Tenant & Homeowner Rights

- AB 2463 – Ban on Forced Sale of Home Due to Consumer Debt (Wicks) prohibits a sale under execution of a judgment lien of a judgment debtor's principal place of residence based on a consumer debt unless that debt was secured by that principal place of residence at the time it was incurred.
- AB 2782 – Mobile Home Rent Control (Stone) allows rent control on mobile home leases that are more than 1 year long. This legislation will take effect on January 1, 2025.
- SB 1079 – Foreclosure Sales (Skinner) requires a seller to receive offers from tenants and potential owner-occupiers in a foreclosure sale. The legislation prohibits the bundling of properties during an auction. This legislation will be operational between January 1, 2021, and January 1, 2026.
- SB 1157 – Optional Credit Reporting for Tenants (Bradford) allows tenants in certain buildings who want to build a credit history to request that their landlord report their rent payments to a credit agency. This legislation will be operational between July 1, 2021, and July 1, 2025.
- SB 1190 – Right to End Lease Early for Victims of Violent Crime (Durazo and Rubio) authorizes a tenant to terminate their tenancy without penalty because an immediate family member, as defined, was the victim of a crime, and would expand the list of eligible crimes to include, among others, a crime that caused bodily injury or death. The legislation authorizes a tenant to attach to the notice any form of documentation that reasonably verifies that the qualifying crime or act occurred.

Appendix F: Summary of Recent Housing Legislation

Some of these 2020 legislation priorities created deficiencies in the City's 5th Cycle Housing Element and/or Zoning Ordinance that required follow-up through this update of the Housing Element. Table G-1 summarizes some of those deficiencies.

Summary of Pending Housing Legislation (as Spring 2021)

Since the adoption of the 2014-2021 Housing Element, substantial legislation in Sacramento has been added. Most of these housing laws addressed topics like permit streamlining, tenant rights, and homeowner rights that are not addressed by the broad programs called for by the City. However, some of these developments will necessitate updates to applicable policies in the upcoming Housing Element update. The following table identifies major pending State housing legislation as of Spring 2021 since the 5th Cycle Housing Element was adopted.

As of Spring 2021, the 2021-2022 California legislative session began with a focus on the housing crisis with a "Building Opportunities for All" housing package. This includes a number of bills that builds upon the housing production bills from the 2020-2021 legislative session that failed to pass out of committee or gain concurrence votes before the session ended. The Building Opportunities for All housing package includes the following Senate Bills ("SB"):

- SB 5 (Atkins, Caballero, McGuire, Rubio, Skinner and Wiener) establishes the broad, initial framework for a statewide housing bond that would fund the creation of new affordable housing for houseless and low-income families. Further details will be crafted as the legislative session progresses.
- SB 6 (Caballero, Eggman and Rubio) allows specified housing development projects in office or retail commercial zones. In authorizing the conversion of underutilized strip malls or "big box" stores to residential spaces, SB 6 requires the residential units be built at a minimum density to accommodate affordable housing. This is similar to last session's SB 1385, which was also introduced by Senator Anna Caballero.
- SB 8 (Skinner) is a placeholder for a density bonus bill.
- SB 7 (Atkins) renews the effort to extend the streamlined CEQA judicial review process developed for Environmental Leadership Development Projects under the 2011 Jobs and Economic Improvement Through Environmental Leadership Act (AB 900). SB 7 would extend the 2021 "sunset" of AB 900

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through 2024. Pro Tem Toni Atkins also introduced last session's version of this bill, SB 995.

- SB 9 (Atkins, Caballero, Rubio and Wiener) allows duplexes and lot-splits in single-family residential zones by-right, if the proposed development meets certain requirements. This is a reintroduction of last session's SB 1120. It retains the arbitrary and impractical requirement that, for a subdivision map to qualify for ministerial approval, the two new parcels that replace the existing single parcel must be of equal size.
- SB 10 (Wiener) grants local governments the ability to rezone parcels close to job centers, transit and existing urbanized areas to allow up to 10 residential units without undergoing CEQA review. Last year's version of this bill was SB 902, also introduced by Senator Scott Wiener.

In addition to the Building Opportunities for All housing package, there are other proposed Senate bills aimed at housing reform.

- SB 15 (Portantino) establishes a grant program to incentivize local governments to rezone idle retail sites for the development of workforce housing.
- SB 290 (Skinner) revises the Density Bonus Law to create more low-income student housing and for-sale housing for moderate-income residents. The bill includes identical language from SB 1085, which failed in 2020 when the Legislature ran out of time for a concurrence vote.
- SB 12 (McGuire) establishes new requirements for addressing wildfire risks in general plan safety, housing, and land use elements. Of note, the bill directs the Department of Housing and Community Development to take into consideration how much land within a jurisdiction is considered a "very high fire risk area" when determining the RHNA allocation. SB 12 also requires land use elements to identify very high fire risk areas and prohibits local governments from entering into development agreements, approving specified discretionary permits, or approving subdivision maps for projects within a very high fire risk area, unless specified findings based on substantial evidence in the record are made.
- SB 55 (Stern and Allen) prohibits new development in very high fire severity zones or state responsibility areas.
- AB 71 (Rivas and Chiu) would dedicate \$2.4 billion annually to houselessness solutions. Revenue sources include state

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adoption of the federal Global Intangible Low-Taxed Income, which taxes certain intellectual property generated overseas. The bill would create the Bring California Home Fund in the State Treasury.

- AB 49 (Petrie-Norris) would eliminate the California Debt Limit Allocation Committee — which, among other projects, finances affordable housing. The bill would move the committee’s duties and authority to the California Tax Credit Allocation Committee, also in the State Treasurer’s Office.
- AB 68 (Salas) would implement recommendations from the recent auditor’s report on the performance of the state’s housing agencies and local impediments to housing production. The report found that the state’s four key financing agencies lack coordination and alignment and that “State law and oversight are not strong enough to ensure that cities and counties are doing their part to facilitate the construction of affordable housing.”
- SB 478 (Wiener), also known as the Housing Opportunity Act, would change land use restrictions such as FAR and lot size requirements. This is an effort to ensure that small scale development can be developed where they are legal based on zoned density, and most importantly that FAR and lot size requirements would not be able to stop these developments. SB 478 proposes two specific statewide policy changes: establishing a minimum floor area ratio (FAR) that cities could impose on all land zoned for two to ten residential units, and establishing minimum lot sizes for parcels that are 2-4 units and for parcels that are 5-10 units.
- AB 1199 (Gipson) would create a database of rental properties, levy a tax on the rental profits of some people or entities holding many properties, and use the funds to support services for tenants and small landlords.
- SCA 2 (Allen, Wiener) would repeal Article 34 of the California constitution which requires a vote on public housing projects.
- SB 477 (Wiener) will require local governments to keep track of data needed to evaluate the impact of state laws on local housing availability and affordability.
- AB 59 (Gabriel) will increase the noticing period for new or increased development impact fees and extends time that a new or increased fee may be challenged.
- AB 115 (Bloom) requires all jurisdictions to allow for residential development in commercially zoned areas provided that the development reserves 20% of the units for affordable housing.

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- AB 215 (Chiu) is an intent bill to strengthen HCD's housing law enforcement authority.
- AB 244 (Rubio) requires TCAC, CDLAC, and the California Housing Finance Agency to conduct an affordable housing cost study across all state funded housing projects.
- AB 345 (Quirk Silva, Medina) clarifies rules around the selling of ADUs built by nonprofit organizations for low-income homeownership. Would allow ADUs built by nonprofits, like Habitat for Humanity, to be sold separate from the primary residence.
- AB 348 (Villapudua, Carillo, Mathis, Patterson, Salas, Jones) requires HCD to conduct an annual summary report that discloses the amount of state, federal, and private funding spent on affordable housing development throughout the state.
- AB 387 (Lee, Wicks) Establishes the California Housing Authority to develop affordable and mixed-income housing.
- AB 561 (Ting, Bloom, Hertzberg, Boerner Horvath, Quirk-Silva) Requires the Office of the Treasurer to work with CalHFA and HCD to create an Accessory Dwelling Unit financing product to assist homeowners in the creation of ADUs.
- AB 571 (Mayes) prohibits affordable housing or inclusionary zoning fees on the bonus units of a project using the state density bonus.
- AB 602 (Grayson) is a spot bill on residential development impact fees.
- AB 617 (Davies) allows jurisdictions the option of paying other jurisdictions to transfer all or a portion of their Regional Housing Needs Assessment allocation.
- AB 672 (Garcia) is an intent bill to enable to use of underutilized golf courses for affordable housing.
- AB 678 (Grayson) is a spot bill on residential development impact fees.
- AB 682 (Bloom) requires cities to allow cohousing projects in areas zoned for multi-family residential.
- AB 816 (Chiu, Bloom, Bonta, Quirk-Silva, Santiago, Wicks) requires the creation of a statewide plan for addressing houselessness and allows for legal action against jurisdictions who do not make progress towards meeting the plan's goals.
- AB 834 (Choi) creates a tax credit for property owners renting to tenants receiving housing assistance.
- AB 880 (Aguiar-Curry) establishes the Affordable Disaster Housing Revolving Development and Acquisition Program

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within HCD to fund the creation and preservation of affordable housing in disaster areas.

- AB 916 (Salas) prohibits public hearings for proposed room additions for single family homes and expands allowable ADU height to 20 feet.
- AB 919 (Grayson) reduces the statute of limitations for construction defects from 10 to 5 years for projects that use a skilled and trained workforce.
- AB 946 (Lee) eliminates mortgage interest deduction on second homes and transfers resulting revenues to the Home Purchase Assistance Fund.
- AB 950 (Ward) authorizes the Department of Transportation to sell excess land to jurisdictions for the purpose of creating affordable housing.
- AB 978 (Quirk-Silva, Chiu, Garcia, Luz Rivas, Robert Rivas) extends rent cap and just cause eviction protections established in the Tenant Protection Act of 2019 to mobile home residents.
- AB 1029 (Mullin, Caballero, Becker) adds housing preservation policies to HCD's list of local prohousing policies.
- AB 1068 (Santiago) requires HCD to create a model plan for the use of alternative forms of housing, including modular housing, for the purpose of cost reduction.
- AB 1090 (Quirk-Silva, Caballero, Gabriel, Rivas, Salas, Wicks, Eggman) establishes the Legislative Task Force on the California Master Plan on Homeownership which will submit a report to the legislature in October 2022.
- AB 1143 (Berman) and SB 649 (Cortese) allow jurisdictions to create local preference policies for affordable housing developments to local residents at risk of displacement.
- AB 1188 (Wicks, Kalra, Wiener) requires cities to create and maintain a rental registry by 2021 covering all landlords who own or operate five or more units.
- AB 1277 (Rubio) creates an expedited judicial review process for CEQA for student housing project.
- AB 1372 (Muratsuchi) requires every jurisdiction to provide access to temporary shelter to every houseless individual.
- AB 1377 (McCarty) creates the California Student Housing Revolving Loan Fund to provide loans for the purpose of constructing affordable student housing.
- AB 1401 (Friedman, Lee, Skinner, Wiener) prohibits parking minimums for residential or commercial projects near transit or within low vehicle miles traveled areas.

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- SB 490 (Caballero, Skinner, Garcia) establishes the Housing Acquisition and Rehabilitation Technical Assistance Program to provide technical assistance.

Appendix G: Community Engagement Meeting Minutes

The following list includes links to the minutes/recording from the following meetings that were held to provide input on the Housing Element and associated former Westside Specific Plan:

- [Westside Specific Plan Stakeholders Advisory Committee Meeting #1: February 2, 2021](#)
- [Westside Specific Plan Stakeholders Advisory Committee Meeting #2: February 16, 2021](#)
- [Westside Specific Plan Stakeholders Advisory Committee Meeting #3: February 23, 2021](#)
- [Westside Specific Plan Stakeholders Advisory Committee Meeting #4: August 18, 2021](#)
- [Westside Specific Plan Stakeholders Advisory Committee Meeting #5: September 28, 2021](#)
- [Housing Commission Meeting: December 8, 2021](#)
- [City Council Study Session: June 21, 2022](#)
- [Westside Specific Plan Stakeholders Advisory Committee Meeting #7: November 29, 2022](#)
- [Westside Specific Plan Stakeholders Advisory Committee Meeting #6: October 11, 2022](#)

Appendix H: Affirmatively Furthering Fair Housing

Assessment of Fair Housing

This portion of the Housing Needs Analysis is focused on assessing the state of fair housing in the City of Vernon, in keeping with AB 686. California jurisdictions are required to affirmatively further fair housing (AFFH) through meaningful actions “that, taken together, address significant disparities in housing needs and in access to opportunity for all groups protected by state and federal law by:

- i. Replacing segregated living patterns with integrated and balanced living patterns
- ii. Transforming racially and ethnically concentrated areas of poverty into areas of opportunity (without displacement)
- iii. Fostering and maintaining compliance with civil rights and fair housing laws
- iv. Note: meaningful actions include actions that will promote fair housing opportunities for low- and moderate-income tenants and tenants of affordable housing, including subsidized housing.” (Government Code 8899.50 (a)(1))

This analysis analyzes five housing issue areas:

1. Fair housing enforcement and outreach capacity
2. Segregation and integration
3. Racially or ethnically concentrated areas of poverty
4. Access to opportunity
5. Disproportionate housing needs within the jurisdiction, including displacement risk.

This AFFH analysis examines the City of Vernon as well as the Southeast Los Angeles Region. This region includes the following cities: Bell, Maywood, Huntington Park, South Gate, and the City of Los Angeles.

Fair Housing Enforcement and Capacity

The City of Vernon works with the Housing Rights Center on the City's Fair Housing Enforcement. Upon receipt of a fair housing complaint the City refers the complaint to the Housing Rights Center. The Housing Rights Center (HRC), founded in 1968, is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing. The HRC's mission is to actively support and promote freedom of residence through education, advocacy, and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by law.

The HRC provides fair housing services to the City of Vernon, including tenant counseling, landlord counseling, outreach, education, and discrimination investigation. Historically, the majority of housing in the City of Vernon has been owned and well maintained well by the City, with the City acting as the landlord. The small amount of private housing is likely the reason for the small number of fair housing complaints in the City. According to HCD's AFFH Data Viewer, there have been 0.21 fair housing inquiries per 1,000 people in the City of Vernon from 2013-2021. While historically there has been little private housing in Vernon, the amount of private housing units increased in 2015 with the opening of the Vernon Village Park Apartments. In addition, the number of private units in the City is expected to increase within the next eight years.

As the number of privately-owned housing units increases in Vernon, the City will take new actions to ensure fair housing enforcement and sufficient outreach capacity within the 6th cycle (Program #7: Equal Housing Opportunity Program). The City will publish on the City's website clear information warning entities that would potentially discriminate about the enforcement of fair housing law. The City will ensure environmental hazards are not disproportionately concentrated in low-income communities of color. The City will explore offering training to property owners and managers regarding responsible management of environmental hazards. The City will assist in outreach to tenants to inform them of their rights to live in habitable housing regardless of income, race, or immigration status. Lastly, the City will develop a code enforcement program that holds property owners accountable, when necessary. Program 22 (Environmental Justice) includes commitments to address environmental concerns in the City.

Since Vernon's population and the number of fair housing complaints are both so small there are no discernable patterns when it comes to the impacts on protected characteristics and geographic trends.

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There have been no recent findings, lawsuits, enforcement actions, settlements, or judgements related to fair housing or civil rights in the City of Vernon. This Housing Element is compliant with existing State fair housing laws and regulations.

Within the Southeast Los Angeles region, the frequency of fair housing complaints is much higher when compared to the frequency in Vernon. The City of Huntington Park experiences 59 fair housing inquiries per 1,000 people from 2013-2021. The City of Bell experiences 36 fair housing inquiries per 1,000 people from 2013-2021. The City of South Gate experiences 98 fair housing inquiries per 1,000 people from 2013-2021. The City of Commerce experiences 13 fair housing inquiries per 1,000 people from 2013-2021.

In order to obtain local knowledge related to housing in the City and corroborate the analysis included in this Element the City and consultant met with the City's Housing Commission. Additionally, the City conducted outreach to fair housing organizations which service the City of Vernon. The consultant also reached out to the Vernon Village Park Apartments property manager to gain demographic data on residents. The City and consultant also met with City residents regarding the state of housing in the City of Vernon. Frequent discussions were also held with City Departments which oversee the management of City owned housing and are in constant communication with tenants. Through discussions residents and local leadership, the City identified the following fair housing issues: a lack of open spaces within the City and the location of some residences away from commercial amenities. Table H-2 (Contributing Factors and Meaningful Actions) identifies factors contributing to these two fair housing issues and specifies the meaningful actions this Element commits to in order to address these fair housing issues in the City of Vernon.

Segregation and Integration

According to HCD's AFFH Guidance segregation "means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic status." Integration means a condition in which there is not a concentration of any type of persons.

The 2020 Census data found that 43.7% of Vernon residents identify as some other race alone, 23.9% identify as White alone, 15.3% identify as two or more races, 9% identify as Black alone, 6.8% identify as Asian alone, and 1.4% identify as American Indian alone. This Census data takes into account the population of the Vernon Village Park Apartments. Clearly, no one race has a majority within the City of Vernon. However, when looking at the 2020 Census data for ethnicity, the Hispanic/Latino population in Vernon is dominant at 168

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residents of the total 222. This means 75.7% of the population is Hispanic/Latino in Vernon.

Based on HCD's AFFH Data Viewer, the majority of Census tracts within the Southeast Los Angeles region feature a strong Hispanic/Latino majority (most surrounding cities have a Hispanic/Latino population of 95% or greater). Directly surrounding the City of Vernon, the predominance of the Hispanic/Latino majority is strongest in comparison to the rest of Los Angeles County. As stated earlier, HCD's AFFH Data Viewer found Vernon to be a White Majority Census tract, with 51.79% of the population being White. At the same time 2016-2020 ACS 5-Year Data identified 75.7% of the City's population as Hispanic/Latino. Clearly, the City of Vernon does not have a Hispanic/Latino population of 95% or more like its surrounding cities in the region.

The reasons for this concentration of Hispanic/Latino families are many, and stem from historical and regional factors. While Vernon has been an almost exclusively industrial city since the 1920's, other Southeast Los Angeles County cities were largely developed in the interwar years as a community for White, working-class families whose heads of household largely held blue-collar jobs in manufacturing and trade (sometimes in Vernon). Many of the cities in the Southeast Los Angeles region have long been disfavored for investment compared to wealthier communities with less exposure to industrial contaminants. Vernon especially has long been favored as an area for industrial investment. Figure H-1 shows that while Vernon was not redlined (or classified in any way by the Homeowners Loan Corporation (HOLC), the majority of cities in the Southeast Los Angeles region were classified as either Class D – "Hazardous" or Class C – "Definitely Declining" during the 1930's.

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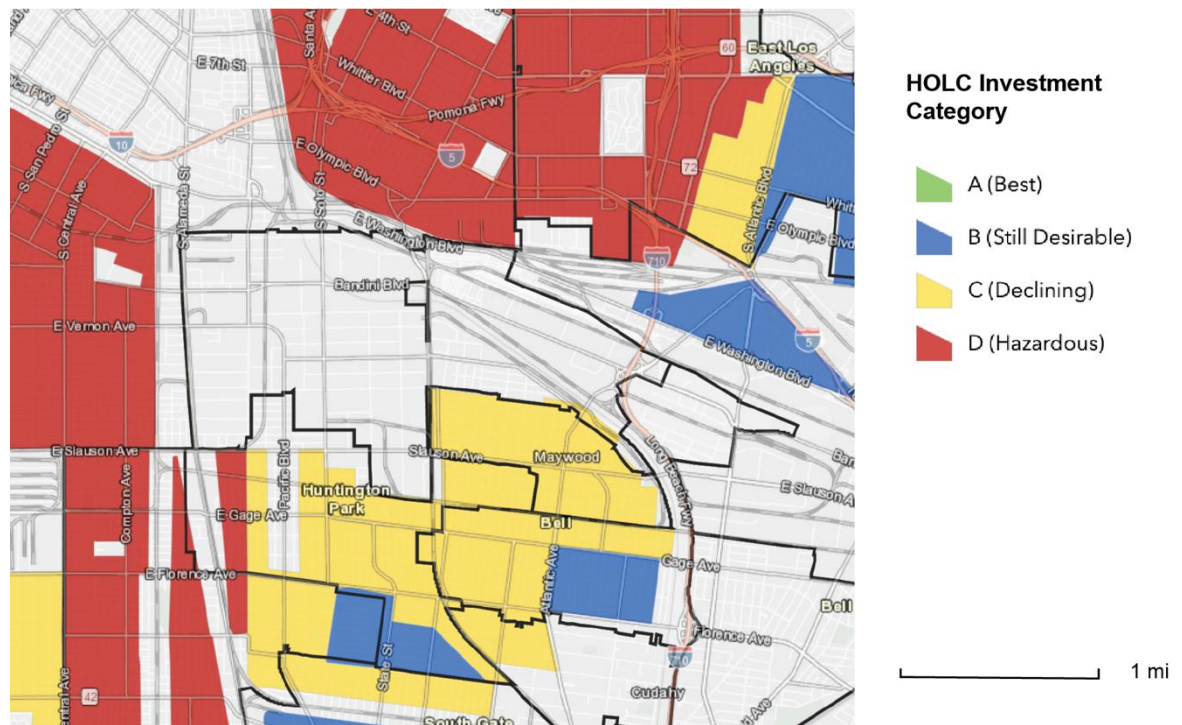


Figure H-1.
Redlining in Southeast Los Angeles.

In the decades following World War II, the White population, particularly those of means, began to decamp the Southeast Los Angeles area for Orange County and other more suburban jurisdictions. During the 1970s, a large, sustained wave of immigration from Latin America began and filled in the neighborhoods in central Los Angeles County that had been abandoned by the White population. More affluent cities and neighborhoods of the metropolitan area enacted stringent zoning regulations to stop population growth and severely curtail the opportunities for residents of Southeast Los Angeles to move into attainable housing in those jurisdictions. Thus, the population of Southeast Los Angeles has remained highly segregated to the present day.

Based on HUD's Low to Moderate Income Population Block Group data from the AFFH Data Viewer, the one block group in the City of Vernon features a population that is 75% low- and moderate-income. This reveals that the City of Vernon's population features a high concentration of low- and moderate-income households. Unfortunately, no more specific data exists in HCD's AFFH Data Viewer to understand income in Vernon by neighborhood or area. The median household income in Vernon is \$59,250 compared to \$71,358 in Los Angeles County, according to 2016-2020 Five-Year ACS Data.

Based on the AFFH Data Viewer, within the Southeast Los Angeles region many cities feature similarly high concentrations of low- and moderate-income

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households. All census tracts within Southeast Los Angeles feature at least 50% of households that are low- and moderate-income, with some tracts averaging out as high as 91%. In the neighboring cities of Bell, Maywood, and South Gate, the median household incomes were \$47,740, \$50,006, and \$55,084 respectively. While the City of Vernon's median household income is greater than the medians in the directly surrounding cities, Vernon's median household income remains significantly lower than the median across Los Angeles County. Additionally, as one moves further Southeast towards Downey the median household income increases, ranging from under \$55,000 to \$125,000, according to 2015-2019 ACS 5-Year data.

According to 2015-2019 ACS 5-Year data, less than 10% of Vernon residents fall under the federal poverty line. Within the Southeast Los Angeles region, no cities have similarly low rates of poverty. Instead, cities surrounding Vernon feature poverty rates of 10% to over 40%. The largest concentration of poverty rates above 30% are located west of the City of Vernon, within the City of Los Angeles. To the south, in the cities of Downey, South Gate, and Lynwood the poverty rates are lower, ranging from under 10% to 30%.

Since there is only one Census tract in the City of Vernon, census data is not especially helpful in discerning spatial patterns of disabled residents. However, it stands to reason that disabled residents in Vernon are concentrated in the few locations within the City where housing is located. Based on 2015-2019 ACS 5-Year data from the AFFH Viewer, the City of Vernon's population is approximately 13.3% disabled. Within the Southeast Los Angeles region, the percent of each city's population with a disability remained low, ranging from 0% to 20%. Census tracts with higher percentages of disabled residents only existed to the North, in and around Downtown Los Angeles.

Family makeup, including married couples (with or without children), persons over the age of 18 living alone and female-headed households can provide insight into potential segregation issues in a community. In terms of family makeup, the City of Vernon is similar to the lower-income communities of Huntington Park, Maywood, and Bell while the City of Vernon differs from wealthier neighboring communities to the east like Downey, Pico Rivera, and Whittier.

Approximately 40% of Vernon's adult population are living within married households. Within the region surrounding Vernon, the majority of the surrounding cities feature 20-40% of the adult population in married households. There are a few census tracts that are exceptions located in the City of Bell, South Gate, and Maywood. The regions to the east of Vernon include wealthier areas such as Downey, Pico Rivera, and Whittier. These three wealthier communities feature census tracts with higher rates of adults living in married households, ranging from 40-60%. Lower levels of married

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households often correlate with lower-income communities and communities with lower levels of educational attainment.

Within the City of Vernon approximately 8 adult individuals live alone, which is a very small percentage of the City's adult population. The regional areas with higher rates of adults who live alone include Downtown Los Angeles to the north of Vernon. The rest of the surrounding region features 20% or less of their adult population living alone.

The City of Vernon has approximately 20-40% of children living in female headed households. Higher rates of children living in female headed households are prevalent in the surrounding region, specifically to the west of Vernon within the City of Los Angeles along the 110 freeway. Elsewhere in the surrounding region the communities are split between communities with similar rates (20-40%) of children living in female headed households and communities with lower rates (under 20%) of children living in female headed households. Higher levels of female-headed households often correlate with lower-income communities and communities with lower levels of educational attainment.

Racially and Ethnically Concentrated Areas of Poverty

Racially and ethnically concentrated areas of poverty, also known as R/ECAPs, must meet the following definitions: 1) The area must have a non-White population of 50% or more and 2) The area must have 40% or more of the population living below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less.

Based on HUD's R/ECAP data from HCD's AFFH Data Viewer Vernon's Census tract does not qualify as a racially and ethnically concentrated area of poverty. In the greater Southeast Los Angeles region a few tracts are identified as R/ECAPs, such as one tract in northeast Bell and two tracts in Southeast Huntington Park. Outside of the Southeast Los Angeles region, there are many tracts north of Vernon and west of Vernon that qualify as R/ECAPs. While Vernon and the Southeast Los Angeles region are racially and ethnically concentrated, clearly Census tracts within this region mainly do not feature concentrated poverty.

All residential buildings within the City are in good condition. Twenty four of the 26 city-owned residences have been recently renovated and the remaining two city-owned residences will be renovated within the sixth cycle planning period. Additionally, the Vernon Village Park Apartments were recently completed in 2015 and are in good condition.

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Generally, to access to parks and open spaces residents must travel to the neighboring cities of Bell, Maywood, and Huntington Park. Through the Westside Mixed Use District Zoning Amendment, the City will evaluate the adding new privately funded open spaces to the City in areas where residential growth is encouraged. In terms of infrastructure, the entire City is well serviced, and no one census tract experiences a disadvantage in terms of access to utility infrastructure, such as water, sewage, gas, electrical, or telecommunication services.

There is one school within the City of Vernon, Vernon City Elementary, a kindergarten through seventh grade school within the Los Angeles Unified School District (LAUSD). Another kindergarten through sixth grade LAUSD elementary school is located just outside of Vernon, called Holmes Avenue Elementary. A second kindergarten through fifth grade LAUSD elementary school is located just outside of Vernon, in Huntington Park, called Pacific Boulevard Elementary. A third LAUSD elementary school is located just outside Vernon in Maywood, called Maywood Elementary. Many Vernon Village Park Apartment families send their children to Maywood Elementary. Vernon City Elementary is located directly across Vernon Avenue from Vernon City Hall, where all of the City-owned residences are located. This route from the City Hall residences to Vernon City Elementary would take 3 minutes walking and the distance from the Vernon Village Park Apartments to the school is approximately 3.4 miles. Maywood Elementary School is a nine-minute walk from the Vernon Village Park Apartments. Holmes Avenue Elementary and Pacifica Boulevard Elementary are located a bit further from the Vernon City Hall and Vernon Village Park Apartments.

The route between Vernon City Hall and Vernon City Elementary is a safe route to school, as it only requires crossing one street and is a three-minute walk at most. The route between the Vernon Village Park Apartments is not walkable, however, though it is accessible through two local Metro bus routes.

Within the 6th cycle planning period, Program 21 (Environmental Enhancements) will evaluate the feasibility of street improvements, such as complete streets interventions and truck restrictions on key residential corridors. These improvements could improve the pedestrian experience for residents and provide infrastructure improvements for multimodal transportation. Additionally, the Metro bus routes 60 and 251 run North to South through the City, along Santa Fe Avenue and Soto Street respectively. These routes connect the City of Vernon to Lincoln Heights, Boyle Heights, South Gate, Lynwood, Downtown Los Angeles, and Compton. These routes connect Vernon residents with job centers outside of Vernon, as much as these routes connect regional residents to jobs within Vernon. Downtown Los Angeles is the largest regional hub for professional jobs, and Vernon is connected directly to Downtown through Metro's 60 bus.

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According to the CalEnviroScreen 4.0 map, the City of Vernon experiences a pollution burden in the 98th percentile. This high pollution burden percentile is similar to burdens throughout the Southeast Los Angeles region. However, unlike some other Southeast Los Angeles cities, the City of Vernon houses many of the industrial uses within the region. Due to this concentration of industrial uses in Vernon, the City has historically been exclusively industrial, with very few residential uses. The pollution burden within the region lessens the further south one moves from Vernon; however, the burdens still remain highly elevated. No more specific information is available as the City of Vernon only features one census tract. See more detailed information on Vernon's environmental constraints within Appendix B of this Element. Additionally, Program 22 (Environmental Justice) includes commitments to address environmental concerns in the City.

In the greater Southeast Los Angeles region a few tracts are identified as R/ECAPs, such as one tract in Northwest Bell, one tract in North Lynwood and two tracts in Southeast Huntington Park. Outside of the Southeast Los Angeles region, there are many tracts north of Vernon and west of Vernon that qualify as R/ECAPs. While Vernon and the Southeast Los Angeles region are racially and ethnically concentrated, clearly Census tracts within this region mainly do not feature concentrated poverty.

Based on the TCAC/HCD Opportunity Area Maps the City of Vernon Census tract does not qualify as a TCAC area of high segregation and poverty. According to this measurement, the threshold for poverty is 30% of the population living below the poverty line and the location quotient is essentially a measure of the concentration of race in a small area compared to a county level. Within Southeast Los Angeles many Census tracts qualify as TCAC Areas of High Segregation and Poverty. These tracts within Southeast Los Angeles fall within the cities of Huntington Park, Bell, Cudahy, Maywood, and Bell Gardens. Outside of the Southeast Los Angeles region, but surrounding the City of Vernon, many Census tracts to the North and West qualify as TCAC Areas of High Segregation and Poverty.

Racially concentrated areas of affluence are defined as Census tracts where: 1) 80% or more of the population is White and 2) the median household income is \$125,000 or greater. No census tract in the Southeast Los Angeles region features a dominant White population and no census tract in the region features a median household income equal to or greater than \$125,000.

Access to Opportunity

Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to 'high resource' neighborhoods. This

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encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities including recreation, and food and healthy environment.

There is one school within the City of Vernon, Vernon City Elementary, a kindergarten through seventh grade school within the Los Angeles Unified School District (LAUSD). Another kindergarten through sixth grade LAUSD elementary school is located just outside of Vernon, called Holmes Avenue Elementary. A second kindergarten through fifth grade LAUSD elementary school is located just outside of Vernon, in Huntington Park, called Pacific Boulevard Elementary. The third elementary school is Maywood Elementary School, a LAUSD school. According to Great Schools, Vernon City Elementary is rated 6/10, which is average, Pacific Boulevard Elementary is rated 5/10, Maywood Elementary School is rated 6/10, and Holmes Avenue Elementary is rated 2/10 which is below average. In comparison to other schools within the region, the majority of which are also LAUSD schools, the school in Vernon is rated similarly to other schools in Southeast Los Angeles. There is no difference amongst schools in and around Vernon and there is no access to more proficient schools in any sort of pattern relating to protected characteristics. Local students at the middle, high school and superior education levels must travel outside the City.

Outside of the Southeast Los Angeles region, to the west of Vernon there are more areas of segregation and racially and ethnically concentrated areas of poverty that correspond to lower quality LAUSD schools, the majority of which are rated either 2/10 or 3/10. The Holmes Avenue Elementary School is just west of Vernon's border, thus falling into this area.

The City of Vernon is an employment center within Southeast Los Angeles for blue-collar jobs. The blue-collar jobs offered in Vernon are well matched to the population of the greater Southeast Los Angeles region, including residents of the City. A significant barrier to job accessibility within Vernon is access and ability to operate a motor vehicle, which affects persons with disabilities as well as other members of the community. While some jobs are close enough for Vernon residents to walk and most are within biking distance, the City's streets are heavily traveled by trucks, most of the City's streets feature large block sizes, and there is a lack of street trees. All of these factors create an environment that is inhospitable to non-motorized forms of transportation. Vernon does have public transit options in the form of bus lines. The line along Santa Fe Avenue and Pacific Avenue (Route 60) is a high-frequency bus line which connects to Downtown Los Angeles (the closest major professional job center), providing greater accessibility options to residents of the Westside of the City, and connecting residents of Huntington Park and other communities southward to job opportunities in Vernon. The Westside Mixed Use District Zoning Amendment will concentrate growth in this area through new mixed-

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use zoning standards. These new mixed-use zoning standards will be imposed on residential and mixed-use developers hoping to develop within the zoning amendment area. These mixed-use standards will require the creation of a more pedestrian friendly design and more retail within the zoning amendment area as mixed-use projects are developed.

Metro route 60 provides north-south service along Santa Fe Avenue at roughly 15-20 minute frequency. Metro provides north-south service on Soto Street with Route 251 with 15-20 minute frequencies. Bell is considered “Car Dependent”, scoring 44 of 100 by WalkScore.com. It is also considered “Somewhat Bikeable”, scoring 39 of 100. Street improvements, such as complete streets interventions and truck restrictions on key residential corridors, will be evaluated for feasibility during the sixth cycle through Program 21 (Environmental Enhancements).

Protected groups, such as those groups that are disadvantaged by race/ethnicity, familial status, persons with disabilities, or class/income, do not live anywhere specific within the City of Vernon, as all residents essentially live within two main locations, the City Hall residences of the Vernon Village Park Apartments. The Vernon Village Park Apartment residents are lower-income, and these residents live in the area of Vernon that is most proximate to amenities.

According to U.S. Census On Map Data, in Vernon, 59.6% of workers are Hispanic/Latino. By race, workers in Vernon are 77.6% are White, 13% are Asian, 5.3% Black, 2% two or more races, 1.7% American Indian, and 0.3% Native Hawaiian. The Hispanic majority in workers reflects the Southeast Los Angeles region’s population, indicating that Southeast Los Angeles residents do not face disproportionate issues securing jobs within Vernon.

The future Metro West Santa Ana Branch Line (which will service existing A Line Stations) will improve Vernon residents’ access to regional transit. Residents will have access to north-south fixed rail service that will provide access to Artesia to the south and Downtown Los Angeles to the north, with connectivity to east-west rail service like the C Line in Paramount to the south and the L, B, D, and A Lines near Downtown Los Angeles.

Most protected groups who reside in the City have sufficient access to transportation options. One exception is disabled residents. While some disabled residents in Vernon are employed, many disabled residents are not employed. In some cases, these disabled residents are unable to work, but in others these residents may experience difficulty in accessing jobs. Generally, disabled residents have disproportionate transportation needs within the City of Vernon; however, the majority of disabled residents live with their families who are able to assist them in their transportation needs. Walking in Vernon can be challenging and generally not an enjoyable means of transportation due

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to traffic congestion, lack of street trees and other reasons. The Westside Mixed Use District Zoning Amendment is anticipated to address the accessibility of walking along the Santa Fe Avenue corridor within the City though mixed-use zoning standards imposed upon residential and mixed-use developers.

A full explanation of the needs of disabled residents in Vernon is included in Appendix A of this Housing Element. However, a short summary is provided here. The most prevalent disabilities in Vernon are ambulatory, independent living, and cognitive respectively. These top disabilities are similar to those found in other cities throughout the Southeast Los Angeles region. Ambulatory disabilities are of particular concern in regard to access to opportunity, specifically to transportation, as previously noted.

Disability by age groups is as follows: 9 disabled residents aged 19-64 and 2 disabled residents aged 65 and up. There is no spatial concentration of disabled residents in any particular Census tract in Vernon.

Approximately half of Vernon's housing stock was built after 1990, which is the year when many regulations went into place mandating the building and inclusion of accessible housing units. Therefore, approximately half of the residences in Vernon are accessible units for disabled residents.

Appendix A does include an assessment of accessibility of homelessness programs and the coordinated entry system. In each of these cases, the City of Vernon does have resources available.

The City of Vernon generally faces significant environmental challenges for housing. These are described in greater detail in Appendix B. Throughout the Southeast Los Angeles region, and specifically in Vernon, there are difficulties in accessing environmentally healthy neighborhoods for all class groups, not just protected class groups. However, residents still wish to live in Vernon and Southeast Los Angeles, so building codes are crafted to address adequate filtering and safety standards for residential developments. Additionally, the Westside Specific Plan proposes a standard of MERV 13 filters on all new residential development.

According to the CalEnviroScreen 4.0 map, the City of Vernon experiences a pollution burden in the 98th percentile. This high pollution burden percentile is similar to burdens throughout the Southeast Los Angeles region. The pollution burden lessens the further south one moves from Vernon; however, the burdens still remain highly elevated.

The City of Vernon does not have an Environmental Justice Element with which consistency needs to be evaluated. The City of Vernon's 6th Cycle Housing Element does include Housing Element Program 6: Environmental Safety

Enforcement which will ensure that Vernon continues to improve the City's access to environmentally healthy neighborhoods. Additionally, Program 22 (Environmental Justice) includes commitments to address environmental concerns in the City, including the creation of an Environmental Justice Element.

This Housing Element's Site Inventory focuses growth in the best and more accessible area in regard to opportunity within the City, which is the southern portion of the City close to Huntington Park. This will be expanded upon in the Site Inventory portion of this AFFH section.

Disproportionate Housing Needs and Displacement Risk

Disproportionate housing needs refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing the category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

Only three units within the City or Vernon are privately owned, non-covenanted housing. The City of Vernon owns a large portion of housing within the City and rents these units at rates below what many other landlords charge, with moderated annual rent increases. Additionally, 45 housing units within the City are located within the Vernon Village Park Apartments, an affordable housing development that opened in 2015, which is not owned by the City. Residents within this complex only pay what they can towards rent and the rest of the rent is paid through project-based Section 8 vouchers.

Cost burden refers to the number of households for which housing cost burden is greater than 30% of their income. Severe cost burden refers to the number of households for which housing cost burden is greater than 50% of their income. According to overpayment data from the 2015-2019 ACS 5-Year Survey, as included in HCD's AFFH Data Viewer, no homeowners within the City of Vernon are cost-burdened or severely cost burdened. The same data finds one renter household within Vernon cost burdened and two households are severely cost burdened. These shares of rent burdened households are significantly lower than those throughout the Southeast Los Angeles region. Within the Southeast Los Angeles region, homeowners and renters alike are cost burdened and severely cost burdened at similar rates. Homeowners in Southeast Los Angeles experience a severe cost burden ranging from 40% to more than 80%. Renters in Southeast Los Angeles feature the same range of

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severe cost burden. Outside of Southeast Los Angeles, the areas directly east and west of Vernon, such as the City of Los Angeles, East Los Angeles, and Montebello, feature severe cost burdens ranging from 60% to more than 80%. The City of Vernon is largely except from the cost burden and severe cost burden faced by the rest of Southeast Los Angeles, due to the fact that only three units in Vernon are vulnerable to the market.

Overcrowding is defined as households having more than 1.01 to 1.5 persons per room. Severe overcrowding is defined as households having more than 1.51 persons per room. Overcrowding is not an issue in the City of Vernon; however, it is an issue within the Southeast Los Angeles region. According to the CHAS data from HCD's AFFH Data Viewer, no households in Vernon are overcrowded and no households are severely overcrowded. Outside of Vernon within the Southeast Los Angeles region, the majority of Census tracts feature over 20% of households that are overcrowded and many households ranging from less than 5% severely overcrowded to over 65% severely overcrowded. The percentage of overcrowding decreases as one moves further Southeast within the region, towards Downey and Santa Fe Springs.

Substandard housing problems are as follows: 1) Lacking a complete kitchen, 2) lacking complete plumbing, 3) severe overcrowding, and 4) severe cost-burdening. According to ACS and CHAS data included in HCD's AFFH Data Viewer, the majority of cities within the Southeast Los Angeles region feature 40 to 60% of households that have any of the four severe housing problems. Thirteen percent of households in the City of Vernon feature any of the four severe housing problems. Severe housing problems are also less prominent to the southeast, beyond Lynwood, in the cities of Downey, Paramount, and Bellflower. In these cities, the percentage of households facing severe housing problems are 29.9%, 38.9%, and 35% respectively.

Homelessness is an issue in Southeast Los Angeles; however, it is not as big of an issue in comparison to communities to the North and East of Southeast Los Angeles. The City of Vernon has a homeless population of 9 people, all of which are unsheltered. Within the greater Southeast Los Angeles region, the cities with the largest homeless populations are in the cities of South Gate, Huntington Park, and Bell Gardens who have 340 people, 86 people, and 133 people who are experiencing homelessness respectively. These numbers are based on LAHSA's 2022 Greater Homeless Count. Within Service Planning Area (SPA) 7, the total unhoused count in 2020 was 4,586.

The neighboring City of Bell has one of the largest homeless shelters in the region, the Bell Salvation Army Shelter which houses a large portion of unhoused people from through the South Los Angeles region. Most of the unhoused residents in the Southeast Los Angeles region are served by the Bell Salvation Army.

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According to data from U.C. Berkeley's Urban Displacement Project, the City of Vernon does not feature a displacement risk. In this context, displacement is defined as any involuntary household move caused by landlord action or market changes. Displacement is not an issue in Vernon as only three housing units are private, meaning that only three households are vulnerable to the whim of the market and displacement pressures.

The greater Southeast Los Angeles region does feature displacement risk, ranging from early/ongoing gentrification, low-income/susceptible to displacement, ongoing displacement, advanced gentrification, and at risk or becoming exclusive. Those cities actively experiencing some level of gentrification are located closest to Vernon within the region and they include cities such as South Gate, Bell, Maywood, and Huntington Park. Within the region, in communities such as Lynwood, Bellflower, Downey, and Paramount, gentrification risk is lower, and communities are more stable moderate/mixed income and at risk of becoming exclusive.

Site Inventory

This Housing Element's Site Inventory includes two sites, both of which are located within the southern portion of the Westside Mixed Use District Zoning Amendment area, along South Santa Fe Avenue. Due to the City of Vernon's industrial nature, plentiful resources and services for residents do not exist within the City. Instead, residents head into surrounding cities such as Huntington Park, Maywood, and Bell. The positioning of the housing element sites within the southern portion of the City and Westside Mixed Use District Zoning Amendment area means these sites are located in close proximity to the better resourced community of Huntington Park. Pacific Boulevard within Huntington Park is a major commercial corridor in close proximity to the housing element sites, featuring medical services, restaurants, banks, grocery stores, retail stores, pharmacies, offices, and more. Additionally, the two sites will accommodate above moderate-income units and lower income units within the same area of the City, avoiding any segregation by income level. The lower income units which are anticipated to develop within the sixth planning cycle should not be concentrated where the rest of lower income units are situated, within the Vernon Village Park Apartments.

The location of the two sites within the Westside of the City situates them furthest away from the most heavily polluting uses in Vernon. The most heavily polluting uses in Vernon are located within the City's rendering overlay zone along the Los Angeles River in the northeast portion of the City. See Appendix

B (Housing Constraints) for a more detailed review of environmental constraints within the City of Vernon. Program 22 (Environmental Justice) includes commitments to address environmental concerns in the City.

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As mentioned previously, the future Metro West Santa Ana Branch Line will improve Vernon residents' access to regional transit. Residents will have access to north-south fixed rail service that will provide access to Artesia to the south and Downtown Los Angeles to the north, with connectivity to east-west rail service like the C Line in Paramount to the south and the L, B, D, and A Lines near Downtown Los Angeles. This Housing Element's Site 2 is approximately 0.68 miles from the Pacific/Randolph station, which is a future West Santa Ana Branch station. Site 1 is 0.88 miles from the future Pacific/Randolph station. The two sites are also located within 1.3 miles of the current Metro A Line Slauson station.

Contributing Factors and Meaningful Actions

Figure H-2 describes the key fair housing issues and contributing factors identified in this Affirmatively Furthering Fair Housing analysis and relates the City's meaningful actions and commitments described in the Goals and Policies, Sites Inventory (Appendix C) and Housing Programs Detail (Appendix E) of this Housing Element.

Identified Fair Housing Issue	Key Contributing Factors	Priority	Meaningful Action
Few fair housing complaints and limited local familiarity with fair housing law	Lack of history of privately owned rental units in City	Low	Program 7 (Equal Housing Opportunity) commits the City to publish on the website clear information warning entities that could potentially discriminate; ensure that environmental hazards are not disproportionately concentrated in low-income communities of color; explore offering training to property owners and managers regarding responsible management of environmental hazards; assist in outreach to tenants to inform them of their rights to live in habitable housing regardless of income, race or immigration status; and develop a code enforcement program that holds property owners accountable when necessary.
Lack of access to recreational facilities in close proximity to residential areas in Vernon.	The City of Vernon's past exclusive industrial strategy.	Medium	Program 8 (Westside Mixed Use District Zoning Amendment) will require that new residential developments incorporate on-site open space and recreational amenities appropriate for the target population.
Some residences in Vernon are not located close to commercial amenities.	High parking requirements for commercial uses and lack of residential population to serve.	High	Both Housing Element sites are located in the southern portion of the City and Westside Specific Plan area. This area is in close proximity to the highly resourced Huntington Park, where residents will be able to access pharmacies, restaurants, grocery stores, medical clinics, offices, banks, and more. New residential developments in Vernon will be located close to highly resourced communities. Program 8 (Westside Mixed Use District Zoning Amendment) zones for additional retail and commercial amenities to develop within the westside of Vernon, where the two Housing Element sites are located. Additionally, Program 8 should bring an influx of new residents into the westside of Vernon, as new housing is developed. Program 8 also plans to reduce parking requirements for commercial uses in the westside of Vernon.
Lack of access to jobs and education for people with disabilities and people who do not own cars	Urban form Heavy trucking	Medium	Program 8 (Westside Mixed Use District Zoning Amendment) will focus future housing growth in areas of the community that are served by public transit and/or facilities for non-motorized forms of transportation. Additionally, the Westside Mixed Use District Zoning Amendment is anticipated to address the accessibility of walking along the Santa Fe Avenue corridor within the City through mixed-use zoning standards imposed upon residential and mixed-use developers. Lastly, through Program 21, Environmental Enhancements, complete streets interventions and truck restrictions on key residential corridors will be explored.

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Contributing Factors and Meaningful Actions			
Identified Fair Housing Issue	Key Contributing Factors	Priority	Meaningful Action
			Both Housing Element sites are located in the southern portion of the City and Westside Specific Plan area. This area is in close proximity to the highly resourced Huntington Park, where residents will be able to access pharmacies, restaurants, grocery stores, medical clinics, offices, banks, and more. Additionally, Program 8 should bring more retail uses into Vernon, creating more job opportunities for residents.
High level of pollution burden and health risks	<p>Heavy trucking</p> <p>Industrial facilities</p> <p>Soil contamination, including hazardous materials release sites.</p> <p>Railroads</p> <p>Waste facilities</p>	High	<p>The Housing Inventory Sites are located in one of the least susceptible areas of the City to pollution burden and health risks, are located downwind of rendering plants, and have not been identified as contaminated sites. Additionally, most of the truck traffic originating in Vernon leaves from the center of the City and heads north. Additional housing within this sixth cycle inventory is set to be built within the southern portion of the City, the area of the City which less significantly less truck traffic than other portions of Vernon.</p> <p>Program 6 (Environmental Safety Enforcement) commits the City to enforcing health and environmental safety regulations on industrial businesses through its Health Department.</p> <p>Program 8 (Westside Mixed Use District Zoning Amendment) will establish new requirements for healthy residential buildings, such as high-efficiency air filters and buffers from uses with heavy industry or trucking.</p> <p>Program 22 (Environmental Justice) commits the City to preparing an Environmental Justice Element of the General Plan. The City will continue to coordinate with the Department of Toxic Substance Control (DTSC) on cleanup resulting from the Exide facility, among other efforts.</p>

Figure H-2