

A G E N D A
**PLANNING COMMISSION
OF THE CITY OF BRADBURY
REGULAR MEETING**

Wednesday, September 27, 2023 – 7:00 P.M.

**BRADBURY CIVIC CENTER
600 Winston Avenue, Bradbury, CA 91008**

The City of Bradbury will gladly accommodate disabled persons wishing to communicate at a City public meeting. If you need special assistance to participate in this meeting, please call the City Manager's Office at +1 (626) 358-3218 at least 48 hours prior to the scheduled meeting.

Materials related to an item on this Agenda submitted to the Planning Commission after distribution of the agenda packet are available for public review at City Hall, 600 Winston Avenue, Bradbury, CA 91008, during normal business hours; 8:30 am - 5:00 pm, Monday through Friday.

1. CALL TO ORDER & PLEDGE OF ALLEGIANCE

- 2. ROLL CALL** Chairperson: Darlene Kuba
Vice-Chairperson: Frank Hernandez
Commissioners: Chelsea Halbmam, Robert Jones, and Melodie Szymkowski

3. SUPPLEMENTAL INFORMATION FROM STAFF REGARDING AGENDA ITEMS

- 4. AGENDA** Approval of the agenda as presented or as modified.

- 5. MINUTES** Approval of the minutes for the Special Meeting of May 30, 2023, and the Regular Meeting of August 23, 2023.

- 6. FAIR POLITICAL PRACTICES ACT** In compliance with the California State Fair Political Practices Act, each Planning Commissioner has the responsibility of disclosing any direct or indirect potential for a personal financial impact that could result from participation in the decision-making process of development applications.

RECOMMENDATION: Receive and file the report as presented or as modified.

- 7. PUBLIC COMMENT** Anyone wishing to address the Planning Commission on any matter that is not on this agenda for a public hearing may do so at this time. Please state your name and address clearly for the record and limit your remarks to five minutes.

Please note that while the Planning Commission values your comments, the Planning Commission cannot respond, nor take action until such a time as a matter may appear on a forthcoming agenda.

Routine requests for action should be referred to City staff during normal business hours; 8:30 am to 5:00 pm, Monday through Friday at City Hall, 600 Winston Avenue, Bradbury, CA 91008, or by calling +1 (626) 358-3218, or by email to CityHall@CityofBradbury.org.

8. PUBLIC HEARINGS

- A. DRAFT OF THE HEALTH & SAFETY ELEMENT UPDATE – GOVERNMENT CODE SECTION 65302(g) PROVIDES THAT THE HEALTH & SAFETY ELEMENT IS TO BE UPDATED WHEN THE CITY REVISES THE HOUSING ELEMENT TO ADDRESS SPECIFIED TOPICS. THE GOAL OF THE SAFETY ELEMENT IS TO REDUCE THE NEGATIVE IMPACTS CAUSED BY NATURAL**

PHENOMENA SUCH AS FIRES, FLOODS, DROUGHTS, AND EARTHQUAKES. THE HEALTH & SAFETY ELEMENT IS REQUIRED TO ADDRESS CLIMATE ADAPTATION AND RESILIENCY STRATEGIES IF THE CITY DOES NOT HAVE A LOCAL HAZARD MITIGATION PLAN AS WELL AS IDENTIFY EVACUATION ROUTES. THE UPDATE INCLUDES A CLIMATE VULNERABILITY ASSESSMENT AND RESIDENTIAL EMERGENCY EVACUATION ROUTE ANALYSIS.

PLANNING COMMISSION RESOLUTION NO. PC 23-314

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE HEALTH & SAFETY ELEMENT UPDATE WHICH INCLUDES A CLIMATE VULNERABILITY ASSESSMENT AND RESIDENTIAL EMERGENCY EVACUATION ROUTE ANALYSIS AND FINDING THE UPDATE TO BE EXEMPT FROM THE CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA) PURSUANT TO THE COMMON SENSE EXEMPTION OF CEQA GUIDELINES SECTION 15061(b)(3)

THE FOLLOWING PUBLIC HEARINGS ARE FOR THE VARIOUS DOCUMENTS AND PROGRAMS FOR THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT:

- B. MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT AND PROPOSED ORDINANCE AMENDING TITLE IX OF THE BRADBURY MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING.

PLANNING COMMISSION RESOLUTION NO. PC 23-315

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT AND PROPOSED ORDINANCE AMENDING TITLE IX OF THE BRADBURY MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING

- C. DRAFT OF THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT – THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT PROVIDED COMMENTS ON THE DRAFT HOUSING ELEMENT AND THE CITY HAS NOW PREPARED A REVISED DRAFT 6TH CYCLE 2021-2029 HOUSING ELEMENT WHICH CONTINUES TO BUILD UPON AND REVISE, AS APPROPRIATE, THE GOALS, POLICIES, AND PROGRAMS OF THE HOUSING ELEMENT, TO ENSURE THAT THE CITY CAN MEET ITS HOUSING NEEDS FOR THE 2021 THROUGH 2029 PERIOD. THE HOUSING ELEMENT PROPOSES AN AFFORDABLE HOUSING OVERLAY ZONE TO BE PLACED ON THE REAR/EASTERLY PORTION OF THE CIVIC CENTER PROPERTY.

PLANNING COMMISSION RESOLUTION NO. PC 23-316

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE REVISED DRAFT 6TH CYCLE 2021-2029 HOUSING ELEMENT

- D. DRAFT OF THE LAND USE ELEMENT UPDATE THAT INCLUDES THE FOLLOWING:
- TECHNICAL REVISIONS TO THE MAPS AND TEXT TO RECOGNIZE CHANGES TO LAND USES WHICH HAVE ALREADY OCCURRED, INCLUDING THE PREVIOUS ADOPTION OF SPECIFIC PLANS;
 - ADDITION OF THE AFFORDABLE HOUSING CIVIC CENTER OVERLAY LAND USE CATEGORY WHICH REPLACES THE EXISTING AFFORDABLE HOUSING OVERLAY LAND USE CATEGORY THAT IS CURRENTLY ON THE ENTIRE CIVIC CENTER SITE;

- UPDATES THE VACANT PARCEL LIST AND UNDERUTILIZED PARCEL LIST; AND
- ADDS ADDITIONAL LAND USE GOALS AND ACTIONS.

PLANNING COMMISSION RESOLUTION NO. PC 23-317

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE LAND USE ELEMENT UPDATE AND FINDING THE UPDATE TO BE EXEMPT FROM THE CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA) PURSUANT TO THE COMMON SENSE EXEMPTION OF CEQA GUIDELINES SECTION 15061(b)(3)

- E. A DRAFT ORDINANCE AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE, REVISE IN ACCORDANCE WITH STATE LAW THE EMERGENCY SHELTER AND TRANSITIONAL AND SUPPORTIVE HOUSING PROVISIONS, ADD PROVISIONS RELATING TO LOW BARRIER NAVIGATION CENTERS, AND AMEND THE CITY OF BRADBURY ZONING MAP TO PLACE AN AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE.**

PLANNING COMMISSION RESOLUTION NO. PC 23-318

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF AN ORDINANCE AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE, REVISE IN ACCORDANCE WITH STATE LAW THE EMERGENCY SHELTER AND TRANSITIONAL AND SUPPORTIVE HOUSING PROVISIONS, ADD PROVISIONS RELATING TO LOW BARRIER NAVIGATION CENTERS, AND AMEND THE CITY OF BRADBURY ZONING MAP TO PLACE AN AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE.


9. ITEMS FROM STAFF AND COMMISSIONERS

- A. Development Project Status Report
- B. Upcoming agenda items and other matters

10. ADJOURNMENT

The Planning Commission is to adjourn this meeting to the regular meeting scheduled for 7:00 p.m., Wednesday, October 25, 2023, at the Bradbury Civic Center.

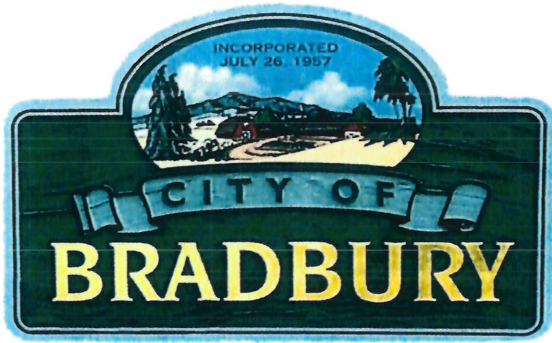
"I, Diane Jensen, City Clerk, hereby certify that this agenda was duly posted at the Bradbury Civic Center entrance no later than 5:00 p.m. on Friday, September 22, 2023."



 Diane Jensen, City Clerk
 City of Bradbury

PC Minutes

05.30.2023



MINUTES

PLANNING COMMISSION OF THE CITY OF BRADBURY

ADJOURNED MEETING

Wednesday, May 30, 2023 - 7:00 P.M.

**BRADBURY CIVIC CENTER
600 Winston Avenue, Bradbury, CA 91008**

1. Call to Order & Pledge of Allegiance

The Adjourned Meeting of the Planning Commission of the City of Bradbury was called to order by Chairperson Chelsea Halbmam at 7:00 p.m., followed by the Pledge of Allegiance.

2. Roll Call

Present: Chairperson Halbmam, Commissioner Hernandez, Commissioner Jones and Commissioner Szymkowski.

Absent: Vice-Chairperson Kuba.

Staff: City Planner Kasama and City Clerk Jensen.

Chairperson Halbmam made a motion to excuse Vice Chairperson Kuba and Commissioner Hernandez seconded the motion. The motion carried 4:0.

3. Supplemental Information from Staff Regarding Agenda Items

None

4. Agenda

Commissioner Hernandez moved to approve the agenda as presented and Chairperson Halbmam seconded the motion, which carried.

5. Minutes

Chairperson Halbmam moved to approve the minutes from the March 22, 2023 Regular Meeting as presented. Commissioner Hernandez seconded the motion, which carried.

6. Fair Political Practices Act

The report states that for the project at 409 Deodar Lane, not one of the Commissioners reside within 500 feet of the subject property. It was recommended that the report be received and filed as presented.

Commissioner Hernandez moved to order the report received and filed as presented. Chairperson Halbmam seconded the motion, which carried.

7. Public Comment

None

8. Public Hearing

409 DEODAR LANE - PLANNING COMMISSION RESOLUTION NO. PC 23-310

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND DECISION WITH A CATEGORICAL EXEMPTION UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) TO CONDITIONALLY APPROVE ARCHITECTURAL REVIEW NO. AR 23-003 FOR A NEW, CONTEMPORARY-STYLE TWO-STORY, 9,500 SQUARE-FOOT, SINGLE- FAMILY RESIDENCE WITH AN ATTACHED 1,500 SQUARE-FOOT, FOUR-CAR GARAGE, AND A DETACHED, 3,800 SQUARE-FOOT, SEMI-SUBTERRANEAN GARAGE/ SHOWROOM, AND 4,300 SQUARE FEET OF ACCESSORY STRUCTURES SUCH AS COVERED PATIOS AND A TRASH ENCLOSURE, AND A SWIMMING POOL AND LIGHTED TENNIS COURT AT 409 DEODAR LANE

City Planner Kasama presented a report for Architectural Review No. AR 23-003. There were no questions from the Commissioners, and Chairperson Halbmam opened the public hearing.

Mr. Philip Chan of PDS Studio is the architect for this new, contemporary style, two-story, 9,500 square-foot single-family residence with an attached 1,500 square-foot, four-car garage, and a detached 3,800 square-foot, semi-subterranean garage/showroom, and 4,300 square feet of accessory structures such as covered patios, trash enclosure, swimming pool and lighted tennis court in the Bradbury Estates at 409 Deodar Lane, which is zoned A-5 and subject to the Hillside Development Standards.

Chairperson Halbmam asked Mr. Chan if he had agreed to the HOA and CSD conditions of approval to which he said, "Yes – back in December 2022." Mr. Chan will also work with an arborist who will be overseeing the removal and replacement of trees.

Since there were no other speakers, Chairperson Halbmam closed the public hearing. It was asked of the City Planner if the neighbors had any comments? There were none. Chairperson Halbmam moved to adopt Resolution No. PC 23-310. Commissioner Szymkowski seconded the motion as drafted to conditionally approve the project with a Categorical Exemption under the California Environmental Quality Act (CEQA). Commissioner Jones seconded the motion. The motion carried by the following 4 to 0 vote:

Ayes: Chairperson Halbmann, Commissioners Hernandez,
Commissioner Jones, and Commissioner Szymkowski
Absent: Vice-Chairperson Kuba
Noes: None

9. Items from Staff and Commissioners

Commissioner Hernandez asked about "Oak Mountain." City Planner Kasama explained that any problems had been resolved and the property was currently vacant.

City Planner Kasama reminded everyone about Bradbury Night Out on Thursday, July 27th at City Hall. He also stated next month's meeting agenda will include the "Reorganization" of the Planning Commission. The new Chair and Vice-Chair will be:

Darlene Kuba – New Chairperson

Frank Hernandez – New Vice-Chairperson.

**Eligibility requires one year on Planning Commission.*

10. Adjournment

At 7:18 p.m., Chairperson Halbmann adjourned the meeting to the regular meeting scheduled for 7:00 p.m. on Wednesday, June 28, 2023, at the Bradbury Civic Center.

Signed by:

Darlene Kuba, Chairperson

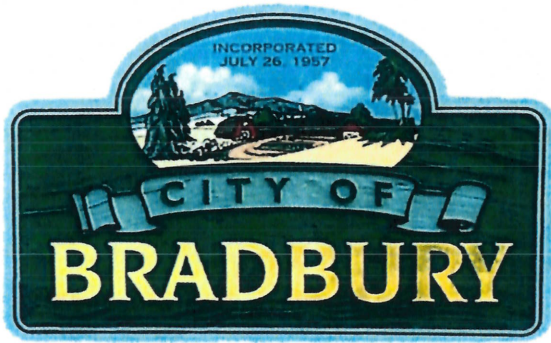
Date

Diane Jensen, City Clerk

Date

PC Minutes

08.23.2023



MINUTES

PLANNING COMMISSION OF THE CITY OF BRADBURY

REGULAR MEETING

Wednesday, August 23, 2023-7:00pm.

**BRADBURY CIVIC CENTER
600 Winston Avenue, Bradbury, CA 91008**

1. Call to Order & Pledge of Allegiance

The Regular Meeting of the Planning Commission of the City of Bradbury was called to order by Chairperson Chelsea Halbmann at 7:02 p.m. followed by the Pledge of Allegiance.

2. Roll Call

Present: Chairperson Halbmann (remote), Vice-Chairperson Kuba and Commissioner Szymkowski.

Absent: Commissioners Hernandez and Jones.

Staff: City Planner Kasama, City Clerk Jensen and Management Analyst Flores.

Vice Chairperson Kuba made a motion to excuse Commissioner Hernandez from the meeting. Chairperson Halbmann seconded the motion which carried unanimously. Chairperson Halbmann made a motion to excuse Commissioner Jones from the meeting and Vice-Chairperson Kuba seconded the motion which carried unanimously.

3. Planning Commission Reorganization and New Roll Call

Per the Municipal Code, Vice-Chairperson becomes Chairperson and the newest Commissioner with at least one year on the Planning Commission becomes Vice Chairperson. New Roll Call taken.

Present: Chairperson Kuba, Commissioners Szymkowski and Halbmann.

Excused Absence: Vice-Chairperson Hernandez and Commissioner Jones.

Staff: City Planner Kasama, City Clerk Jensen and Management Analyst Flores.

4. Supplemental Information from Staff Regarding Agenda Items – City Planner Kasama stated there was none.

5. Agenda Approval

Commissioner Szymkowski made a motion to approve the agenda as presented. Chairperson Kuba seconded the motion which carried unanimously.

6. Minutes

Commissioner Szymkowski made a motion to approve the Minutes for the Regular Meeting of May 24, 2023 and the Adjourned Meeting of May 30, 2023 at the next Planning Commission meeting on September 27, 2023. Chairperson Kuba seconded the motion which carried unanimously.

7. Public Comment

City Manager Kearney stated that there were no members of the public present.

8. Public Hearing

The three proposed ordinances are in preparation for the adoption of the 6th Cycle Housing Element.

A. REASONABLE ACCOMODATIONS POLICY & PROCEDURE

In 2019, The City of Bradbury adopted an Ordinance crafted by the City of Oakland in response to concerns raised by a Disability Rights Advocacy Group. Updates eliminate "subjectivity" from the process and provide for a much timelier process instead of referencing the Planning Commission.

RECOMMENDATION: Planning Commission conduct a public hearing to adopt PC Resolution No. 23-311 and the City Council move to adopt proposed Ordinance No. 386.

Chairperson Kuba opened and then closed the Public Hearing due to no public comments. Commissioner Halbmam proceeded to make a motion to adopt PC Resolution No. 23-311 and Chairperson Kuba seconded the motion.

AYES: Chairperson Kuba, Commissioner Halbmam and Commissioner Szymkowski.

NOES: None.

ABSENT: Excused Commissioners Hernandez and Jones.

MOTION CARRIED: 3:0

B. DENSITY BONUS LAWS

Proposed ordinance #387 adds to the City of Bradbury's municipal code the density bonus provisions as required by state law. The proposed ordinance is to adopt state regulations by reference. This is preferred due to the complexity of the regulations and with the historic frequency with which they've been amended by the state. It would also eliminate coming before the Planning Commission and then the City Council every time the Ordinance needed amending as it would automatically be amended anytime the State amended them.

RECOMMENDATION: Planning Commission conduct a public hearing and then find that proposed Ordinance #387 is exempt from CEQA and that the Commission adopt PC Resolution No. 23-312 and that the City Council adopt Proposed Ordinance No. 387.

Chairperson Kuba opened and then closed the Public Hearing due to no public comments. Commissioner Szymkowski made a motion to adopt PC Resolution No. 23-312 and Commissioner Halbmam seconded the motion.

AYES: Chairperson Kuba, Commissioner Halbmam and Commissioner Szymkowski.

NOES: None.

ABSENT: Excused Commissioners Hernandez and Jones.

MOTION CARRIED: 3:0

C. AMEND SECONDARY LIVING QUARTER REGULATIONS *(guest houses, accessory dwelling units, etc.)*

ADU's vs. SB9 units: It has been clarified that legislation intended that both types of units are allowed and not an "either/or" situation.

Applicability of Fire Sprinklers: Backed by numerous findings for justification, the City of Bradbury crafted its own "Firezone ADU" requiring fire sprinklers in all dwelling whether the main dwelling has them or not. The City is confident that the Housing and Community Development (HCD) will not oppose their "Firezone ADU" requirements because ADU's and SB9 units are permitted anywhere in Bradbury with the exception of three narrow streets (Woodlyn Lane from Bradbury Hills Road to El Cielo, all of Bradbury Hills Road and Furlong from Deodor to Long Canyon) which are not wide enough to allow trucks and cars to pass or no adequate access.

Allowable Building Height: Initially 16 feet and now discussions are for 18 feet or 25 feet is unit is attached to primary dwelling. The City of Bradbury is allowing 18 feet across the board to avoid any confusion going forward.

RECOMMENDATION: Planning Commission conduct a public hearing and then find that proposed Ordinance #388 is exempt from CEQA and that the Commission adopt PC Resolution No. 23-313 and that the City Council adopt Proposed Ordinance No. 388.

Chairperson Kuba opened and then closed the Public Hearing due to no public comments. Commissioner Szymkowski made a motion to adopt PC Resolution No. 23-313 and Commissioner Halbmann seconded the motion.

AYES: Chairperson Kuba, Commissioner Halbmann and Commissioner Szymkowski.

NOES: None.

ABSENT: Excused Commissioners Hernandez and Jones.

MOTION CARRIED: 3:0

9. Items from Staff and Commissioners

A. Development Project Status Report - None

B. Upcoming agenda items and other matters:

- i. Review updated Housing, Safety, and Land Use Elements.
- ii. Affordable Housing Overlay Zone to go with the Housing Element Process. All commissioners chose to have these documents printed and delivered rather than reading on the City's website.

10. Adjournment

At 7:21p.m., Commissioner Szymkowski made a motion to adjourn the meeting. Chairperson Kuba seconded this motion. The meeting was adjourned to a regular meeting scheduled for Wednesday, September 27, 2023, at the Bradbury Civic Center.

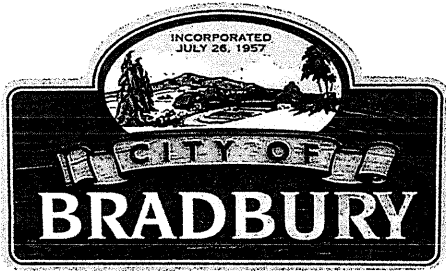
Signed by:

Darlene Kuba, Chairperson

Date

Diane Jensen, City Clerk

Date



Richard Barakat, Mayor (District 3)
Richard T. Hale, Mayor Pro Tem (District 1)
Monte Lewis, Council Member (District 2)
Bruce Lathrop, Council Member (District 4)
Elizabeth Bruny, Council Member (District 5)

City of Bradbury Agenda Memo

TO: Honorable Chairperson and Planning Commissioners

FROM: Mario Flores, Management Analyst

DATE: September 27, 2023

SUBJECT: **Health and Safety Element Update**

ATTACHMENTS: 1) Resolution No. PC 23-314

RECOMMENDATION

Staff recommends that the Planning Commission conduct a public hearing, provide input, approve Resolution No. PC 23-314, and recommend City Council approval on the revised Health and Safety Element which includes a Climate Vulnerability Assessment and Evacuation Route Analysis.

SUMMARY

The Health and Safety Element (Element) is a state-mandated General Plan element that must identify potential natural and human-created hazards that could affect the City of Bradbury's (City's) residents. The purpose of the Element is to establish a framework that anticipates these hazards and prepares the community to minimize exposure to these risks.

The Element conveys the City's goals, policies, and actions to minimize hazardous situations and protect and improve public health in and around the City. It identifies the natural and human-caused hazards that affect existing and future development, describes present and expected future conditions, and sets policies and standards for improved public safety. Natural hazards may include earthquakes, wildland fires, floods, and slope failure. Human-caused hazards may include chemical contamination, structural fires, transportation accidents, and air and water pollution.

BACKGROUND

The State of California requires every city to have a Safety Element in its General Plan. State law requires that the City of Bradbury update its Health and Safety Element every eight (8) years in conjunction with updates to the Housing Element with the most recent update covering the 6th cycle planning period from 2021-2029. Furthermore, an update to the Element is needed to comply with Senate Bill (SB) 379, which became effective in 2017. This calls for cities to include a climate adaptation update with goals, policies, objectives, and implementation measures. The Element update incorporates a series of revised and added sections to fully comply with SB 379.

The Health and Safety Element was last adopted by the City Council as part of the General Plan Update in 2014. The Element is divided into two chapters, Noise and Safety.

ANALYSIS

City staff, in collaboration with the retained Consultant (De Novo Planning Group), began the process to update the Element in September of 2022. The primary revisions to the Element update include 1) a Climate Vulnerability Assessment, and 2) an Evacuation Route Analysis.

Climate Vulnerability Assessment

A Climate Vulnerability Assessment (CVA) has been prepared to identify risks that climate change poses to the City. A CVA is a comprehensive evaluation that identifies and analyzes a community's susceptibility to climate change. Relevant goals, policies, objectives, and actions informed by the CVA have been added to the Health and Safety Element and a high-level overview of the findings is included.

Evacuation Route Analysis

An Evacuation Route Analysis was conducted to enhance the City's emergency preparedness and response capabilities. An Evacuation Route Analysis is a comprehensive analysis that identifies and evaluates optimal pathways and methods for safely evacuating people and assets from specific locations throughout the City in the event of an emergency or disaster. It plays a vital role in ensuring the safety and well-being of residents in the event of natural or human-caused hazards.

The City of Bradbury Planning Department is recommending that the Health and Safety Element Update be found exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to the common sense exemption of CEQA Guidelines Section 15061(b)(3) that CEQA only applies to projects which have the potential for causing a significant effect on the environment and where it can be seen with certainty that there is no possibility that the activity will have a significant effect, the activity is not subject to CEQA. As this is a policy document that will not cause any physical changes to the environment, there will not be any impact from adoption.

ATTACHMENT #1

PLANNING COMMISSION RESOLUTION NO. PC 23-314

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE HEALTH & SAFETY ELEMENT UPDATE AND THE CLIMATE VULNERABILITY ASSESSMENT AND RESIDENTIAL EMERGENCY EVACUATION ROUTE ANALYSIS AND FINDING THE UPDATE TO BE EXEMPT FROM THE CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA) PURSUANT TO THE COMMON SENSE EXEMPTION OF CEQA GUIDELINES SECTION 15061(b)(3)

WHEREAS, Government Code section 65302(g) provides that the Health & Safety Element is to be updated when the City revises the Housing Element to address specified topics;

WHEREAS, The goal of the safety element is to reduce the negative impacts caused by natural phenomena such as fires, floods, droughts, and earthquakes;

WHEREAS, The Health and Safety Element (Exhibit "A") is required to address climate adaptation and resiliency strategies if the city does not have a local hazard mitigation plan as well as identify residential developments in hazard areas that do not have at least two emergency evacuation routes;

WHEREAS, The revisions include a Climate Vulnerability Assessment (Exhibit "B") and an Evacuation Route Analysis (Exhibit "C");

WHEREAS, The City of Bradbury Planning Department is recommending that the Health & Safety Element Update be found exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to the common-sense exemption of CEQA Guidelines Section 15061(b)(3);

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF BRADBURY, DOES HEREBY RESOLVE, FIND, AND DETERMINE AS FOLLOWS:

SECTION 1. A duly noticed public hearing has been conducted at the regular meeting on September 27, 2023, in accordance with the provisions of the Bradbury Municipal Code relative to this matter.

SECTION 2. The information in the agenda report, and the testimony at the public hearing are incorporated in this Resolution and comprises the bases on which the findings have been made.

SECTION 3. The proposed amendments will promote health, safety, peace, morals and general welfare of the City and its people.

SECTION 4. The Health and Safety Element meets the requirements of Government Code section 65302 and covers all required topics.

SECTION 5. The updated Health and Safety Element is consistent with the other elements of the General Plan.

SECTION 6. The Planning Commission hereby recommends to the City Council the approval and adoption of the Health and Safety Element of the General Plan.

SECTION 7. The Planning Commission further recommends that the City Council find that the Health and Safety Element Update is Categorically Exempt under the provisions of the California Environmental Quality Act (CEQA) pursuant to the common sense exemption per Section 15061(b)(3) of the CEQA Guidelines that CEQA only applies to projects which have the potential for causing a significant effect on the environment and where it can be seen with certainty that there is no possibility that the activity will have a significant effect, the activity is not subject to CEQA.

SECTION 8. The City Clerk shall certify to the adoption of this Resolution.

PASSED, APPROVED, AND ADOPTED this 27th day of September, 2023.

Chairperson

ATTEST:

City Clerk

I, Diane Jensen, City Clerk, hereby certify that the foregoing Resolution No. PC 23-314 was duly adopted by the Planning Commission of the City of Bradbury, California, at a regular meeting held on the 27th day of September, 2023, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

EXHIBIT “A”

General Plan 2012-2030

Health and Safety Element

(Noise and Safety Elements Combined)

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Safety Chapter

Purpose

The Bradbury General Plan Health and Safety Element is comprised of two state-mandated general plan elements (Noise and Safety). The Safety Chapter of the Health and Safety Element focuses on those elements of risk to the residents that should be considered in current and future development planning.

The purpose of the Safety Chapter is to protect the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction, and other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other hazards known to the legislative body; including flooding; and wildland and urban fires.

The Safety Chapter of the Health and Safety Element includes mapping of known seismic and other geologic hazards. It also addresses evacuation routes, peakload water supply requirements, and minimum road widths and clearances around structures, as those items relate to identified fire and geologic hazards. Pursuant to Senate Bill (SB) 379, the Safety Chapter addresses climate adaptation and resilience strategies applicable to the City as well.

This Safety Chapter is the primary vehicle for relating local safety planning with the City's land use decisions. The City has established land use policies, standards, and designations based on among other things the criteria set forth in this Safety Chapter. Additionally, local decisions related to zoning, subdivisions, and entitlement permits, for example, will be tied to the Safety Chapter's identification of hazards and hazard abatement provisions. The City of Bradbury Safety Chapter examines those issues related to protecting the community from any unreasonable risks associated with earthquakes, slope instability, flooding, and fire. The Chapter also indicates design standards, such as peakload water supply requirements; minimum road widths; and clearances around structures. Finally, the Safety Chapter identifies evacuation routes and emergency reception centers.

The Safety Chapter works in conjunction with the City's Hazard Mitigation Plan, which was developed in accordance with the Disaster Mitigation Act of 2000 (DMA 2000) and followed FEMA's Local Hazard Mitigation Plan guidance. The Hazard Mitigation Plan incorporates a process where hazards are identified and profiled, the people and facilities at risk are analyzed, and mitigation actions are developed to reduce or eliminate hazard risk. The implementation of these mitigation actions, which include both short and long-term strategies, involve planning, policy changes, programs, projects, and other activities. To access the latest Hazard Mitigation Plan, please visit the City's web site at:

https://www.cityofbradbury.org/community/public_safety/index.php

Safety Element Objective

Hazards affecting the City of Bradbury can be divided into two major categories: 1) naturally occurring hazards; and 2) human-caused hazards. Naturally occurring hazards include

earthquakes, wildland fires, floods, and slope failure. Chemical contamination, structural fires, transportation accidents and air and water pollution are examples of human-caused hazards.

The objective of the Safety Chapter is to enable the City to be sensitive to those natural and human-caused hazards in future decision-making and to be able to respond in a timely manner in the event of an emergency. As a result, the following principal serves as the framework for the City of Bradbury Safety Chapter: *Public safety is the focus of the emergency preparedness plan which emphasizes the risks associated with earthquakes, wildfire, flooding, and other human-caused and natural hazards.* In response to this principal, the Safety Chapter provides the foundation for a detailed inventory of those risks that need to be considered. This Chapter also establishes standards related to public safety.

Relationship to Other General Plan Elements

California Planning Law requires that all elements of the General Plan be consistent. While all of the General Plan Elements are independent, they are also interrelated. Certain goals and policies of one element may also address items that are issues of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans, programs and achievement of community goals. The Safety Chapter is most directly related to the Land Use and Circulation Elements and the Conservation and Open Space Chapters.

Related Agencies, Laws and Plans

The following state mandates impact planning and development:

Colbey-Alquist Floodplain Management Act. The Colbey-Alquist Floodplain Management Act encourages local governments to plan, adopt and enforce land use regulations for floodplain management, in order to protect people and property from flooding hazards. This Act also identifies requirements which jurisdictions must meet in order to receive state financial assistance for flood control.

Alquist-Priolo Earthquake Fault Zoning Act. The Alquist-Priolo Earthquake Fault Zoning Act requires the state Geologist to identify earthquake fault zones along traces of both recently and potentially active major faults. Cities and counties that contain such zones must inform the public regarding zone location.

Seismic Hazards Mapping Act. Pursuant to the Seismic Hazards Mapping Act, the state Geologist compiles maps identifying seismic hazard zones. Development in seismic hazard areas is subject to policies and criteria established by the State Mining and Geology Board. Additionally, approval of development on a site within a seismic hazard area mandates the preparation of a geotechnical report and local agency consideration of compliance with applicable state requirements.

Landslide Hazard Identification Program. The Landslide Hazard Identification Program requires the state Geologist to prepare maps of potential landslide zones within urbanizing areas.

Fire Hazards. The threat of wildfires in foothill areas in Southern California has been of concern for many years. Government Code Sections 51175 through 51189 direct the California Department of Forestry and Fire Protection (CAL FIRE) to map areas of significant fire hazards

based on fuels, terrain, weather, and other relevant factors. These zones, referred to as Fire Hazard Severity Zones (FHSZ), define strategies to reduce the hazard associated with wildland fires. As part of this mapping effort, areas designated for management by CAL FIRE are identified as State Responsibility Areas (SRA). Areas managed by local fire departments are identified as Local Responsibility Areas (LRA). The entire City of Bradbury lies within a LRA and fire protection is provided by the County of Los Angeles Fire Department (LACoFD). Most of the City is located within a Very High Fire Hazard Severity Zone (VHFHSZ) established by CAL FIRE and reflected on Exhibit H-S Safety No. 1. In 2012, the California State Legislature adopted SB 1241 which requires communities to protect themselves against wildland and urban fires by addressing the fire hazard in areas designated as VHFHSZ.

Overview of Safety Chapter Issues

The City of Bradbury has attempted to identify and analyze natural and human-caused hazards and the associated risks that residents may be subjected to.

Fire Hazards The threat of wildfires in foothill areas in Southern California has been of concern for many years. Very high risk for wildfire is evident in areas having steep slopes that are covered with chaparral vegetation and where there is limited access for fire control equipment. Low hazard areas are developed urban areas where fire access is readily available and the terrain is relatively flat. Industrial areas, hazardous material users, structures with substandard electrical wiring, overhead high voltage power lines, and high pressure gas lines are examples of urban fire hazards.

The City of Bradbury developed a Community Wildfire Protection Plan (CWPP) with input and direction from City of Bradbury stakeholders and the community. The purpose of the CWPP is to serve as a fire protection planning document that presents the City's physical characteristics, wildfire hazard, assets at risk from wildfire, vegetation/fuel management projects and specifications, and goals and action items intended to reduce wildfire hazards in the City. The ultimate goal of the CWPP is to protect lives, property, and natural resources threatened by wildland fire. The final version of the CWPP was adopted by the Bradbury City Council on March 15, 2022 and was annexed into the City's Hazard Mitigation Plan on August 16, 2022. To access the Community Wildfire Protection Plan, please visit the City's website at:

https://www.cityofbradbury.org/community/public_safety/cwpp.php

In order to facilitate immediate firefighting response, the City should have the following standards for areas that are located in high or very high FHSZs:

- There should be sufficient access routes and roads for emergency vehicles and for the evacuation of residents from all areas.
- Adequate access should be provided for all developed areas. All roadways to hazard areas should be of sufficient width to accommodate firefighting equipment. Streets should be marked and addresses should be posted in plain view. Adequate water supply should be available and sufficient for fire suppression activity.

All development within the VHFHSZ should comply with the standards set forth in LACoFD's Fuel Modification Plan. The three primary components needed to reduce fire losses are:

1. Implementing building construction methods that reduce building fire hazards;
2. Providing adequate defensible space around structures to reduce fuel; and
3. Identifying areas where there is a significant risk and a history of significant losses.

Public Resources Code (PRC) Section 4291 requires that homeowners provide fuel modification to 100 feet around their buildings to create a defensible space for firefighters and to protect their homes from wildfires. Residents must reduce dry fuel around the perimeter of any structure and comply with the adopted codes that provide standards for mitigating fire hazards. Good defensible space around structures allows adequate area for firefighters to fight a fire and avoid injury to personnel and equipment. Terrain, climate conditions, and vegetation interact to affect fire behavior.

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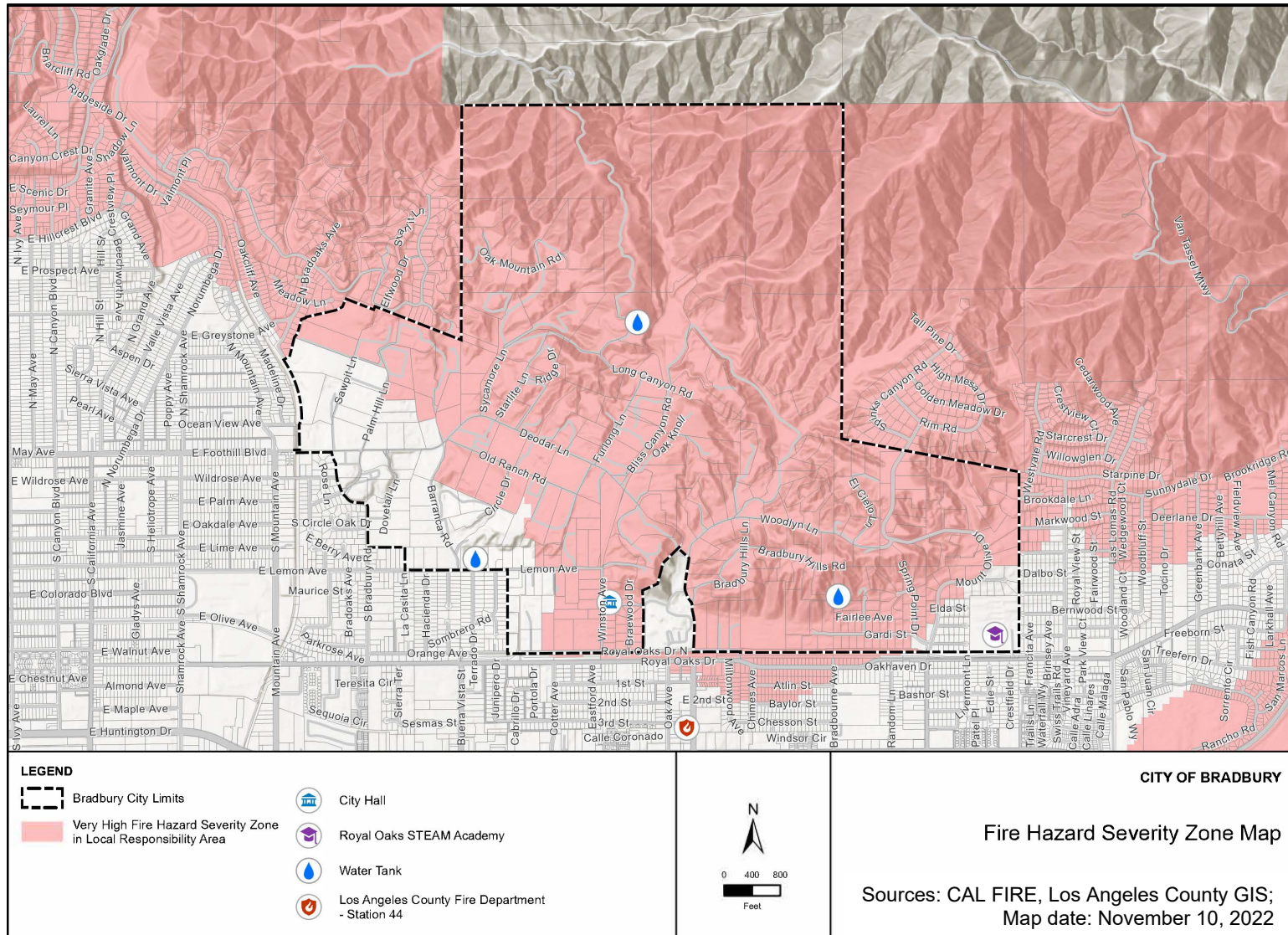


Exhibit H-S Safety No. 1 FIRE HAZARD SEVERITY ZONES

Bradbury's location at the base of the San Gabriel Mountains creates a wildland-urban interface (WUI) that makes Bradbury more susceptible to wildfires than cities that do not border the foothills. During community workshops many residents expressed their concern that safety and preparedness were the highest priority for the community.

The U.S. Geological Survey (USGS) in partnership with the U.S. Forest Service (USFS) provides fire danger forecasting tools that utilize a combination of satellite-derived vegetation indices, various biogeophysical variables, and weather information to produce 7-day forecasts. The City may use these tools in coordination with LACoFD to determine fire potential index, large fire probability, and fire spread probability.

Historic Wildfires in the City of Bradbury

Fortunately, there have been limited wildfire outbreaks within the City, and they are described below.

1953 Duarte Fire. This fire originated between Spinks Canyon and Maddock Canyon in wildland area. A total of 561 acres burned in this fire.

1958 Norum Fire. This fire burned in the foothills north of Monrovia, Duarte, Bradbury and Azusa. A total of 6,440 acres burned in the Norum Fire.

1980 Stable Fire. On November 16, 1980 a fire storm that had been fanned by Santa Ana Wind conditions swept down from the foothills and destroyed 35 homes in the City of Duarte and 14 homes in the City of Bradbury. Reports indicated that the fire had moved from the City of Azusa, east of the San Gabriel River to the Duarte and Bradbury homes in 8 to 10 minutes, due to a strong shift in winds. Immediately after the fire, city and county personnel began taking measures to deal with the devastation. A Disaster Assistance Center was established at Duarte City Hall and federal and state agencies were contacted for help. The Los Angeles County Fire District set up a mobile command center and the City of Duarte set up an emergency shelter. In the weeks that followed the fire, the City established several programs to deal with possible floods and mudslides that could occur due to the bare slopes where all vegetation had been burned off. Mud diversion structures were constructed, sandbags were distributed, and parking was restricted on streets with potential slides.

2009 Station Fire. Since the Stable Fire other large wildland fires have occurred in the surrounding communities near Bradbury. The largest being the Station Fire of 2009. The Station Fire was the 10th largest wildfire in California history, burning 160,577 acres and killing two firefighters since it began in late August. The fire started in the Angeles National Forest near the U.S. Forest Service ranger station on the Angeles Crest Highway (State Highway 2). The blaze threatened 12,000 structures in the National Forest and the nearby communities of La Cañada Flintridge, Glendale, Acton, La Crescenta, Littlerock, Pasadena and Altadena, as well as the Sunland and Tujunga neighborhoods of the City of Los Angeles. The fire was predicted to burn for months and travel miles to the City of Azusa behind the City of Bradbury. The Station Fire burned on the slopes of Mount Wilson, threatening numerous television, radio and cellular telephone antennas on the summit, as well as the Mount Wilson Observatory, which includes several historically significant telescopes and multi-million-dollar astronomical facilities operated by UCLA, USC, UC Berkeley and Georgia State University. In October 2009, the fire went out due to a fall rainstorm.

Historic Wildfires near the City of Bradbury

Areas bordering the City are highly prone to wildfires and, therefore, the City is exposed to a threat from wildfires originating outside the city limits. Below are descriptions of two of the most recent notable fires outside the City. A list of additional fires within five miles of the City can be found in the CWPP.

2016 San Gabriel Complex Fire. The most recent wildfire outbreak closest to Bradbury was the San Gabriel Complex Fire which ignited the morning of June 20, 2016. The San Gabriel Complex Fire consisted of two fires, the Reservoir Fire and the Fish Fire. Both fires originated northeast of the city limits. The cause of the Reservoir Fire was due to a vehicle crash while the cause of the Fish Fire is still under investigation. The fires were burning fuel that was 7-10 years old with 6 to 8-foot tall chaparral and large grass crops. At the height of the fire, 1,376 homes were evacuated. The American Red Cross established an Evacuation Center and 1,460 staff from multiple local, state, and federal agencies worked to protect property and suppress the fire. Road closures were in place and law enforcement patrolled for security while firefighters worked through the night to contain the fire. Although the San Gabriel Complex Fire threatened homes in the City, no property damage was reported.

2020 Bobcat Fire. The Bobcat Fire started on September 6, 2020. By December 18, it was fully contained and had burned 115,796 acres in the central San Gabriel Mountains, in and around the Angeles National Forest. It is one of the largest fires on record in Los Angeles County to date. The fire triggered mandatory evacuation orders in parts of Arcadia and Camp Williams. The cause is still under investigation but is thought to be due to a power line conductor torching overhead trees. The fire initially spread southward which prompted evacuation orders for residents in Sierra Madre, Monrovia, Bradbury, and Duarte, along with evacuation warnings for those in Arcadia, Pasadena, and Altadena. The fire then grew westward and threatened the Mount Wilson Observatory by September 15, approaching within 500 feet of the observatory as firefighters worked to protect the structure. By September 17, the fire rapidly expanded to the north into Pleasant View Ridge Wilderness due to moderate coastal winds, leading to mandatory evacuations in Antelope Valley as the fire approached Juniper Hills. Containment difficulties were exacerbated by very dry vegetation and rugged topography that made it difficult to access. An estimated 6,000 structures were threatened and there were six injuries. The fire destroyed 27 residences and damaged 28 others. It also destroyed 83 structures and damaged 19 others. Two hundred forty personnel were deployed.

Flood Hazards The potential for flooding is generally described in terms of a statistically projected frequency. For example, a 100-year flood has a 1.0 percent chance of occurring in a given year, while a 500-year flood is one which has a 0.2 percent chance of happening in any given year. A 500-year flood would be slightly deeper and cover a greater area than a 100-year flood. The San Gabriel River lies east of the City of Bradbury, and it is designed to contain a 100-year flood. The river is fully operational and is maintained by the U.S. Army Corps of Engineers and the Los Angeles County Flood Control District. The construction of San Gabriel River improvements in 1947 reduced the local area's risk of flooding. Los Angeles County Drainage Area studies performed by the Army Corps of Engineers have shown no deficiencies along the San Gabriel River. The elevated nature of the City removes Bradbury from flood danger from the San Gabriel River.

The San Gabriel River is the central backbone of the San Gabriel River Watershed. The

watershed for the San Gabriel River is one of several coastal watersheds in Southern California that drain hundreds of square miles of mountainous and urban lands to the Pacific Ocean. The character of the river changes dramatically along its 58-mile journey from Cogswell Dam (near the headwaters in San Gabriel Mountains) to its mouth at the Pacific Ocean. On its run to the sea, the San Gabriel River passes through 19 different cities. A network of dams and flood control measures controls the San Gabriel River. The natural water cycle and flow are significantly altered to protect adjacent communities from flood damage and to better use local water resources for urban and agricultural water supplies.

Serious flooding has not been a problem in Bradbury because the low density residential development has permitted the retention of natural ground cover which retards serious floods. In addition to the natural ground cover, the Bradbury Debris Basin and the Spinks Debris Basin and check dams, maintained by the Los Angeles County Flood Control District, also provide the City with protection from large scale floods. A series of concrete lined channels and underground storm drains exist within and around the perimeter of the City. These backbone storm drain facilities are maintained by the Los Angeles County Flood Control District. The City's large agriculturally zoned and developed parcels either retain surface run-off on-site or it is directed to the public facilities by a system of privately owned and maintained drainage swales. Minor occurrences concerning water runoff occurred in the past during extremely wet years, however privately owned improvements have been made to rectify the local flooding issues. These minor flooding problems tend to be localized and primarily relate to very small mudslides and small erosion problems in areas where the natural topography had been altered.

Much of the soil in Bradbury Canyon is of an alluvium base material and it is susceptible to runoff problems if the natural ground cover has been removed and not replaced with landscaping or other mitigating measures. The City maintains a policy of investigating any localized runoff or mudslide problems through the assistance of the City Engineer and the Los Angeles County Department of Public Works.

Since the City of Bradbury has not been studied by the National Flood Insurance Program (NFIP) to ascertain flood hazards, it is difficult to estimate if there is an area that might be at risk of flooding. The City's history does not contain any reports of catastrophic flooding that would endanger resident's health or safety. The National Flood Insurance Program (NFIP) designated Bradbury as "Zone D" which means that no analysis of flood hazards has been conducted. Mandatory flood insurance purchase requirements do not apply, but coverage is available.

Geologic Hazards The City of Bradbury is situated along the foothills of the San Gabriel Mountains, west of the San Gabriel River as reflected on Exhibit H-S Safety No. 2. Geographically, the San Gabriel Mountain Range is made up of two roughly parallel ranges. The northern, inland range extends from Mt. Gleason eastward past the 9,000-ft. summit of Mt. Waterman and Baden-Powell and terminates near the only summit over 10,000-ft. (Mt. San Antonio or Old Mt. Baldy). The range's major watershed is the San Gabriel River who's three main forks and countless tributaries drain approximately 20 percent of the precipitation in the mountains.

There are geologic conditions within and around the City of Bradbury that could cause problems if proper precautions are not taken. The northern mountainous areas of the City are generally too steep and bedrock is too unstable for typical construction. Erosion, landslides and ground shaking from earthquakes can be severe hazards within these areas. Exhibit H-S Safety No. 3 identifies the portions of the City of Bradbury that are susceptible to landslide and liquefaction.

Landslides Geologic hazards in the City of Bradbury include the potential for landslides, erosion, and debris flow and liquefaction in areas with loose soils and high water tables. Landslide hazards may involve relatively intact, dense bedrock materials or highly fractured and broken, jumbled bedrock. Landslides often occur along pre-existing zones of weakness within the bedrock. Local folding of the bedrock adds to the potential for slope failure. However, many landslides do not seem to be controlled by the position of the bedding rock relative to the topography but by other factors such as rock type and its attendant characteristics (density of jointing and fracturing). Landslides have been known to occur in the northern steep sections of the City. Other areas of the City may experience landslides should conditions change that adversely affect slope stability.

Erosion Erosion is the natural process by which earth materials are loosened, worn away, decomposed, or dissolved, and transported to another site. Precipitation, runoff, running water, and wind are common agents of erosion. The potential for erosion is generally low in exposed natural slopes but it greatly increases when slopes have been denuded of all ground cover and vegetation. Barren slopes are more susceptible to erosion and subject to riling or raveling.

The potential for debris flow depends primarily on the presence of Colluvium deposits upstream and the increase in soil moisture due to heavy rainfall. A debris flow is a fast moving, liquefied landslide of unconsolidated, saturated debris that looks like flowing concrete. It is differentiated from a mudflow in terms of the viscosity and textural properties of the flow. Flows can carry material ranging in size from small stones to large boulders. Often debris flows contain large amounts of woody debris such as logs and tree stumps. The soil known as Colluvium is loose bodies of sediment that have been deposited or built up at the bottom of a low-grade slope or against a barrier. The deposits that collect at the foot of a steep slope or cliff are also known by the same name. The Bradbury and Spinks Canyon Debris Basins control debris flows.

Seismic Hazards The U.S. Geologic Survey (USGS) is responsible for providing scientific information regarding natural hazards and disasters within the United States in order to protect and save lives. Geologic events and seismic activity in particular, are the primary natural hazards of the community. Earthquakes are caused by violent and abrupt releases of strain built up along faults. When a fault ruptures, energy is released in all directions from the source, or epicenter, in the form of seismic waves. Earthquakes generate two types of hazards. Primary hazards are ground shaking and surface rupture along faults. Secondary hazards result from the interaction of ground shaking with existing ground instabilities and include: liquefaction, settlement, and landslides.

The City of Bradbury is located in a seismically active region and in an area of potential fault rupture, strong ground shaking, and slope instability. These geologic and seismic hazards can affect the integrity of structures and utilities, and in turn can cause severe property damage and potential loss of life. In California, faults are common, ranging from small breaks of an inch or less, to the significant breaks experienced along the San Andreas Fault which extends for hundreds of miles. In addition to size, the age of a fault has a direct bearing on the likelihood of generating an earthquake. Many large faults have not moved for millions of years and are considered “dead” or inactive.

The two principal seismic considerations for most cities in Southern California are damage to

structures due to seismically induced ground shaking and surface rupture along active fault traces. Strong ground motions could have a major impact on the City of Bradbury due to the proximity and earthquake potential of nearby active faults. The local geologic and topographic conditions of Bradbury's location at the base of the San Gabriel Mountains could either amplify or attenuate the seismic waves. Surface ruptures could also have a major impact on the City of Bradbury. Surface ruptures occur during an earthquake when movement along an active fault breaks the ground surface.

The City of Bradbury contains two earthquake faults (Exhibit H-S Safety No. 3). The Sierra Madre Fault extends through the major portion of the Bradbury along the base of the San Gabriel Mountains. The Duarte Fault extends across the southern portion of Bradbury and bisects an unincorporated County island. The Duarte fault is actually a "segment" of the Sierra Madre Fault. Movement along these frontal faults has resulted in the uplift of the San Gabriel Mountains. Seismic activity is expected to be a maximum of 7.2 magnitude.

The Sierra Madre-Cucamonga Fault Zone includes several fault segments extending for over 86 miles along the southern margin of the San Gabriel Mountains. The two main portions of the Sierra Madre-Cucamonga Fault Zone include the Sierra Madre fault to the west and the Cucamonga fault to the east. The fault zone is inclined to the north, dipping below the San Gabriel Mountains and uplifting them above the Los Angeles Basin. The fault zone was responsible for the 1971 6.6 magnitude San Fernando earthquake on its westernmost segment near the City of Sylmar. The Sierra Madre fault passes through the northern portions of Pasadena, Arcadia, Monrovia, Bradbury, Duarte, Azusa, and portions of San Dimas. The locations of the regional faults are shown in H-S Exhibit Safety No. 2.

The Sierra Madre fault zone is divided into five main segments, labeled with the letters A through E, to more easily characterize this fairly complex system. It was not the fault responsible for the 1991 Sierra Madre earthquake.



Source: California Institute of Technology, SCEC, 02/07/2012

Exhibit H-S Safety No. 2 REGIONAL FAULT SEGMENTS

The most recent surface ruptures are seen on the B and D segments. The least active segment, is the A segment, also known as the Vasquez Creek fault, which runs between the San Gabriel fault and the intersection of the B and C segments of the Sierra Madre fault zone. At the junction of the C and D segments, the Clamshell - Sawpit Canyon fault splays off from the fault zone, toward the northeast (shown in sea green on the map above). It was this fault, not the Sierra Madre fault zone itself, that ruptured to produce the Sierra Madre earthquake of 1991.

One of the strands that make up segment D is known as the Duarte fault, because of its location near that community. Segment E represents the easternmost part of this fault zone, and at its eastern end, it meets up with several other faults in a complex zone northwest of the City of Upland, near the epicenter of the 1990 Upland earthquake. The general trend of the Sierra Madre fault zone continues eastward from this point along the base of the San Gabriel Mountains, but this eastern continuation is known as the Cucamonga fault zone. The Cucamonga fault zone seems to be more active, (has a higher slip rate) than the Sierra Madre fault zone.

Faults are continuously being found by geologists/seismologists within the region. These scientists have identified almost 100 faults in the Los Angeles area that are suspected of being capable of generating earthquakes with a magnitude of 6.0 or greater. Included within the newly discovered faults are faults classified as “blind thrusts.” These faults do not reach the ground

surface but do connect many of the known surficial faults at depth and under virtually the entire Los Angeles, San Fernando, and San Gabriel Basins. When a fault ruptures, energy spreads in the form of seismic waves. Seismic waves travel through the earth's crust and eventually reach the ground interface creating surface waves which cause the ground to vibrate up and down and side to side. The City of Bradbury may experience some or all of the hazards associated with seismic waves including ground rupture, ground shaking, landslides, flooding, and liquefaction.

Ground Rupture represents the primary hazard associated with earthquakes since it is the initial result of seismic events. Surface rupture poses a difficult seismic problem from an engineering standpoint because it is far more expensive and complicated to design a foundation and structure to withstand the displacement of even fractions of a foot than to build without consideration of ground rupture. Such ground fractures can cause parallel displacement in the foundation, causing buildings to crack and split. Development should be avoided in areas of high fault potential.

Ground Shaking The most significant earthquake action in terms of structural damage and loss of life is ground shaking. Ground shaking is the movement of the earth's surface in response to a seismic event. The intensity of the ground shaking and the resultant damages are determined by the magnitude of the earthquake, distance from the epicenter and characteristics of surface geology. This hazard is the primary cause of the collapse of buildings and other structures. Increased hazards from earthquakes occur when the seismic activity occurs in a highly urbanized area. The significance of an earthquake's ground shaking action is directly related to the density and type of buildings and the number of people exposed to its effect.

Liquefaction is a phenomenon involving the loss of shear strength of soil. Liquefaction involves a sudden loss in strength of saturated, cohesion soil (mostly sand) which is caused by shock or strain, such as generated by an earthquake and results in temporary transformation of the soil to fluid mass. If the liquefying layer is near the surface the effects are much like that of quicksand on any structure located on it. If the layer is in the subsurface, it may provide a sliding surface for the material above it.

Liquefaction typically occurs in areas where the groundwater surface is less than 30 feet below the ground surface and where the soils are composed of soft fine sand. There are several liquefaction zones located in the northern and eastern portions of the City of Bradbury. During and after a severe rain event, liquefaction could occur should a moderate severe earthquake take place.

Although, Bradbury has not experienced measurable ground failure due to an earthquake in recent years, the potential for damage due to ground failure is still present. Past seismic events indicate that the City of Bradbury has been free of major damaging earthquakes for at least 130 years. However, a number of historic earthquakes have affected the City in varying degrees from nonstructural damage (toppling of building contents) to minor structural damage (cracks in swimming pools).

A major earthquake occurring in or near Bradbury may cause injuries and even death, extensive property damage, fire, hazardous spills and other hazardous effects that could be aggravated by aftershocks and by the secondary effects of fire, hazardous materials/chemicals accidents and possible failure of waterways and dams.

Seiches, or periodic oscillations (“sloshing”) of bodies of water such as ponds, lakes, and bays, usually occur in moderate to great earthquakes. Seiches may raise and lower a water surface from a few inches to several feet, and may occur several thousand miles away from the earthquake epicenter.

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Safety and Emergency Preparedness Plan

The two existing emergency response plans, the County of Los Angeles All-Hazards Mitigation Plan and the Los Angeles County Operational Area Emergency Response Plan (OAERP), provide the tools to coordinate the disaster recovery operations of County fire control and law enforcement agencies with local agencies and governments. The City currently has a number of ordinances, programs and requirements in existence pertaining to seismic and fire hazards. Primary among these are the subdivision and building permit approval requirements for seismic strengthening and adequate access. The State Office of Emergency Services (Cal OES) has established three levels of emergency response to peacetime emergencies, which are based on the severity of the situation and the availability of local resources in responding to that emergency. The three levels of emergency response include:

- Level 1: A minor-to-moderate incident wherein local resources are adequate in dealing with the current emergency.
- Level 2: A moderate-to-severe emergency where local resources are not adequate in dealing with the emergency and mutual aid assistance would be required on a regional or statewide basis.
- Level 3: A major disaster where local resources are overwhelmed by the magnitude of the disaster and state and federal assistance are required.

Each potential hazard to the public safety has been assessed according to the following levels of risk:

- Low Risk: The level of risk below which no specific action is deemed necessary. The occurrence of a specific event is unlikely.
- Medium Risk: The level of risk above which specific action is required to protect life and property, though the probability of the event taking place is low to moderate.
- High Risk: Risk levels are significant and occurrence of a particular emergency situation is highly probable or inevitable.

The scope or risk refers to the geographic area that could be potentially affected with the occurrence of one of the hazards. The scope of risk includes three levels:

- Local: The affected geographic area that is directly affected is localized or site specific.
- Citywide: The affected area includes a significant portion or all of the City.
- Regional: The affected area includes the entire City as well as the surrounding region.

The low-density character of Bradbury has been mentioned as a positive factor in terms of general safety. Any incremental intensification of existing residential uses may, to some degree, increase susceptibility to fire and/or seismic events. The expansion of urban uses is preceded by, or accomplished in conjunction with, the expansion of infrastructure, and the provision of a wide range of vital services and facilities. Future development plans and proposals for all property located within the City, including the 302 acres of privately owned undeveloped hillside open space, will be scrutinized for compliance with the City's Safety and Emergency Preparedness Plans and to minimize exposure to hazards.

Police Services. Police protection is provided by the Los Angeles County Sheriff's Department (LACSD). The City maintains a contract with the Sheriff's Department law enforcement services. Although the City contracts for a minimum level of service, in times of emergency the Sheriff dedicates all available personnel and equipment to address the community's needs.

The Duarte Satellite Sub-Station is the launching center for 30 police officers. These officers are responsible for providing police services to the City of Duarte, the City of Bradbury and surrounding unincorporated areas. The Satellite Sub-Station does not have dispatch or booking facilities. The Temple City Sherriff's Station is the base of operations location for the region. Dispatch and booking facilities are located there.

Fire Services. Fire protection / emergency medical services are provided to the City by the Los Angeles County Consolidated Fire Protection District (CFPD). The closest fire station, Station 44, is located at 1105 Highland Avenue in the City of Duarte. The station is staffed with at least seven firefighters 24 hours a day. The equipment includes two fire trucks, one patrol vehicle and one water tender. Backup paramedic assistance is provided by Station 29 which is located in the City of Baldwin Park and Station 32 which is located in the City of Azusa. The City of Monrovia Fire Department offers additional mutual aid when necessary and requested by the County. Los Angeles County Fire also provides hazardous material services. The U.S. Forest Service in San Dimas provides wildfire service in the Angeles National Forest.

Medical Services. Emergency medical services are available throughout Los Angeles County. Acute care facilities near Bradbury include Methodist Hospital in Arcadia, Huntington Hospital in Pasadena, City of Hope National Medical Center in Duarte, Kaiser-Permanente Foundation Hospital in Baldwin Park and Foothill Presbyterian Hospital in Glendora.

Peakload Water Supply

Peakload water supply is defined as the supply of water available to meet both domestic water and firefighting needs during the particular season and time of day when domestic water demand on a water system is at its peak. California American Water provides potable water to the City of Bradbury. Potable water is provided from ten (10) wells located in and around Bradbury.

Storage of potable water in the Duarte service area (which includes the City of Bradbury) is provided by eight (8) reservoirs of which four (4) are located within Bradbury. The total storage capacity is 11.5 million gallons, which is the equivalent of about 175% of an average day's demand. All of the reservoirs are covered to reduce evaporation.

California American Water is seeking the State Water Resources Control Board's Division of Drinking Water approval to operate the new Live Oak Well and Reservoir located on Arrow Highway in the Duarte service area. It is anticipated that the new facilities will be online by the end of 2023.

Peakload water supply on August 11, 2005 was 19.5 million gallons. Peakload water demand is always highest during the hot summer months. The maximum day demand (MDD) over the last 20 years has been 12.9 million gallons. Design capacity is based on the peak demand periods.

Hazard Mitigation Plan

The City of Bradbury adopted the updated Hazard Mitigation Plan on February 21, 2019 by City Council Resolution No. 19-03. The updated plan fulfills the City's obligation pursuant to the Federal Disaster Mitigation Act of 2000. The plan adoption and update process involved the participation of all City departments and interested City residents. Furthermore, the Community Wildfire Protection Plan was annexed into the Hazard Mitigation Plan on August 16, 2022.

The Hazard Mitigation Plan includes the following mitigation goals:

Protect Life and Property

- Implement activities that assist in protecting lives by making homes, businesses, infrastructure, critical facilities, and other property more resistant to losses from natural hazards.
- Improve hazard assessment information to make recommendations for avoiding new development in high hazard areas and encouraging preventative measures for existing development in areas vulnerable to natural hazards.

Enhance Public Awareness

- Develop and implement education and outreach programs to increase public awareness of the risks associated with natural hazards.
- Provide information on tools, partnership opportunities, and funding resources to assist in implementing mitigation activities.

Preserve Natural Systems

- Support management and land use planning practices with hazard mitigation to protect life.
- Preserve, rehabilitate, and enhance natural systems to serve natural hazard mitigation functions.

Encourage Partnerships and Implementation

- Strengthen communication and coordinate participation with public agencies, citizens, non-profit organizations, business, and industry to support implementation.
- Encourage leadership within the City and public organizations to prioritize and implement local and regional hazard mitigation activities.

Strengthen Emergency Services

- Establish policy to ensure mitigation projects for critical facilities, services, and infrastructure.
- Strengthen emergency operations by increasing collaboration and coordination among public agencies, non-profit organizations, business, and industry.
- Coordinate and integrate natural hazard mitigation activities, where appropriate, with emergency operations plans and procedures.

Hazard mitigation is the responsibility of the City; however, the following agencies provide support and assistance with preparedness, response, recovery, and administration of funding efforts.

- Governor's Office of Emergency Services (Cal OES) – responsible for disaster mitigation,

preparedness, response, recovery, and the administration of federal funds after a major disaster declaration.

- Southern California Earthquake Center (SCEC) – gathers information on earthquakes and releases information to the public to increase earthquake awareness, reduce economic losses, and save lives.
- California Department of Forestry and Fire Protection (CDF or CAL FIRE) – responsible for all aspects of wildland fire protection on private and state-owned land. CDF or CAL FIRE administers forest preservation regulations, including landslide mitigation, on non-federally owned land.
- California Division of Mines and Geology (DMG) – responsible for geologic hazard characterization, public education, and reduction of risk of tsunami inundation.
- California Division of Water Resources (DWR) – plans, designs, constructs, operates, and maintains the State Water Project, regulates dams, provides flood protection, and assists in emergency management.

Hazardous Waste and Materials Management Program The LACoFD Health Hazardous Materials Division administers the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program for the City of Bradbury. The Unified Program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste programs (Program Elements):

- Hazardous Waste Generation (including on-site treatment under Tiered Permitting).
- Above ground Petroleum Storage Tanks (only the Spill Prevention Control and Countermeasure Plan of “SPCC”).
- Underground Storage Tanks (UST).
- Hazardous Material Release Response Plans and Inventories.
- California Accidental Release Prevention Program (Cal ARP) and Uniform Fire Code Hazardous Material Management Plans and Inventories.

Emergency Preparedness

Bradbury’s location in Southern California and in the San Gabriel Valley makes it susceptible to a number of natural disasters and other emergencies. As such, the City Council appointed a Public Safety Committee – a five-member advisory body to the Bradbury City Council to help prepare the community. Committee members serve as a communication link between the community, City Council and staff regarding issues pertaining to emergency preparedness. Committee members are hands-on volunteers who assist in the emergency operations and with the emergency related programs and services offered to the community.

The specific and primary purpose of the Public Safety Committee is to:

- A. Assess and define emergency needs;
- B. Locate and publicize available resources;
- C. Conduct exercises, manage responses and oversee simulated, actual or impending emergencies when called upon to do so by the Mayor, Mayor Pro-Tem or City Manager.

Committee members serve for a term of four years, beginning July 1st and ending June 30th, and are eligible upon request to serve one additional consecutive term for a total of eight years.

Most committee members are CERT (Community Emergency Response Team) trained. These volunteers are educated about disaster preparedness for hazards that may impact the area and in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. CERT members can assist others in their neighborhood or workplace following an event when professional responders are not immediately available to help.

Additionally, the City of Bradbury has implemented the Connect-CTY service to provide the City the ability to communicate with residents regarding time-sensitive matters, such as unforeseen events or emergencies.

With the Connect-CTY system, the City can quickly contact residents by telephone, cell phone, text message or e-mail regarding urgent and important information. For example, in the event of an emergency, the City can quickly let residents know what to do or where to go for services. Only authorized City officials are allowed to send messages. Other non-emergency messages can be sent by e-mail regarding upcoming meetings, events or workshops.

Disaster Area Management. During World War II, the National Civic Defense Program was activated. The Los Angeles County and the local military authorities quickly recognized that the size and complexity of the county would require a unique management structure to effectively coordinate war-related activities amongst the county, cities, private sector and other agencies. Civil Defense Areas were formed and each area was supervised by an Area Coordinator. After the war, Civil Defense transformed into Disaster Management with an emphasis on planning, training, exercising and public education for earthquakes, fires, floods, severe weather events and epidemics. The City of Bradbury resides in the “Area D” area of responsibility. Other cities in “Area D” include Arcadia, Azusa, Baldwin Park, City of Industry, Claremont, Covina, Diamond Bar, Duarte, El Monte, Glendora, Irwindale, La Puente, La Verne, Monrovia, Pomona, Rosemead, West Covina, Temple City, Walnut, South El Monte, Sierra Madre, and San Dimas. There are eight Disaster Management Areas; each has a coordinator, to work with cities and partner agencies to assist their emergency management activities and to act as a liaison between local government and county, state and federal agencies.

City Staff meets with cities within this area of responsibility once a month to discuss topics such as federal reporting and reimbursement after a disaster, incident command, working with minorities, the disabled and the underserved community, public relations and emergency evacuation. The City also participates in a monthly county-wide radio checks with “Area D” Coordinators.

Alert LA County. Alert LA County is an emergency mass notification system established by Los Angeles County to contact County residents and businesses via recorded phone messages, text messages or e-mail messages in case of emergencies. The system will be used by the County’s Emergency Operations Center to notify residents and businesses of emergencies or critical situations and provide information regarding necessary actions, such as evacuations. The system uses the telephone companies’ 911 database and is able to contact land-line telephone numbers, whether listed or unlisted. If the call is picked up by an answering machine, the system will leave a recorded message. If the number called is busy or does not answer, the system will redial the number in an attempt to deliver the message. The system is also TTY/TDD compatible.

Alert LA County uses 911 databases; therefore, only land-line numbers are automatically included in the system. To be notified at a cellular phone or receive an e-mail notification, a person must register the cellular phone number and/or e-mail address. Each cellular number and/or e-mail address can only be associated with one street address in the system. The registered telephone number and e-mail address will be contacted only when the street address it is associated with is impacted by a disaster or emergency.

Specific Needs Disaster Voluntary Registry (SNAP). The purpose of Specific Needs Disaster Voluntary Registry (SNAP) is to facilitate the planning and implementation of disaster response by first-responder agencies to Specific Needs persons living in the County of Los Angeles. The registry is a project of the Los Angeles County Office of Emergency Management in cooperation with other cities and agencies in the Los Angeles County disaster response operational area.

If a person living in Los Angeles County has any of the following conditions which might impede their abilities to evacuate a building, travel to or stay safely in an emergency evacuation center, or to securely shelter in place without assistance, they should enroll in the program:

- Physical disabilities
- Cardiac and/or respiratory circumstances
- Developmental disabilities
- Emotional or psychiatric disabilities
- Deafness or hearing loss
- Blindness or severe vision loss
- Speech impairments
- Short-term disabilities
- Reliance on technologies that use electricity
- Using medications
- Participation in a home delivery program
- Need specialized paratransit vehicles
- Experience seizures
- Immune system deficiencies
- Communicable diseases

Should a disaster strike in the area, this registry will be used to enhance the efficiency of those agencies called upon to respond, including the Los Angeles County Sheriff's Department (LACoSD) and LACoFD.

Evacuation Routes and Reception Centers

Emergency preparedness includes the designation of evacuation routes and emergency facilities. The following facilities are delineated in Exhibit H-S Safety No. 4 and the following rules apply:

Primary Evacuation Routes. The roads are to be kept open at all times. In the event of temporary closure due to maintenance and/or construction, LACoFD is to be notified.

Reception Centers. The Bradbury Civic Center (600 Winston Avenue, Bradbury, CA 91008) and the City of Duarte Community Center (1600 Huntington Drive, Duarte, CA 91010) will serve as Reception Centers for disseminating information, collection points, distribution centers, etc.

Local Emergency Operations Center (EOC). The Bradbury Civic Center will serve as the local EOC, the alternate site is City of Duarte Community Center until which time the County of Los Angeles designates another local facility.

Critical Facilities. Certain public facilities require special consideration because of the number of persons located in the facility at any one-time. Only one critical facility is located within the City (Royal Oaks Elementary School). Royal Oaks (a senior assisted living facility) is located adjacent to the City in the County unincorporated area.

Residential Developments. The City prepared an analysis consistent with SB 99 to identify residential developments in hazard areas that do not have at least two emergency evacuation routes. The analysis identified one area of concern in the southeast corner of the City with limited emergency access points that warrants further study. The City will continue to coordinate with LACoFD and LACSD to ensure adequate exit strategies are available for all residential developments. For all new developments, roadways are to be a minimum 20 feet wide and will include emergency turnarounds with minimum dimensions established in coordination with LACoFD. A White Paper describing the methodology used to map the evacuation routes is included as Appendix H-S B to the Safety Chapter.

The evacuation routes in the City and those facilities that will serve as collection/information centers are located on Exhibit H-S Safety No. 4. The Emergency Evacuation Plan does not apply to normal day-to-day emergencies and the well-established and routine procedures used in coping with such emergencies. In the event of a serious hazard which would require the evacuation of Bradbury residents, the following streets would be used as primary evacuation routes:

- Mount Olive Drive.
- Woodlyn Lane (gates will be opened to permit exiting at Royal Oaks Drive, North). The access gate located near Mount Olive Drive will be used by “First Responders” to gain access to the Woodlyn Lane neighborhood.
- Deodar Lane (gates at Wild Rose, Barranca, and Woodlyn Lane) will be opened to permit exiting from the Bradbury Estates neighborhood.
- Winston Avenue and the Lemon Avenue access to the Flood Control Channel will be used as access points for “First Responders.”

Evacuation will be handled by Los Angeles County safety personnel under contract to the City (i.e. Fire, Sheriff, etc.). In a major disaster, mutual aid sources in adjacent jurisdictions are likely

to be fully committed to their own needs, and there may be substantial delays in the request and transport of assistance from more distant locations. Ingress to and egress from the City is likely to be inhibited by damage caused by the disaster and related congestion. Effective disaster preparedness will require the concerted efforts of City personnel, contracted first responders and residents. Not only must effective plans and procedures be in effect, but those plans should be tested and improved through disaster preparedness exercises.

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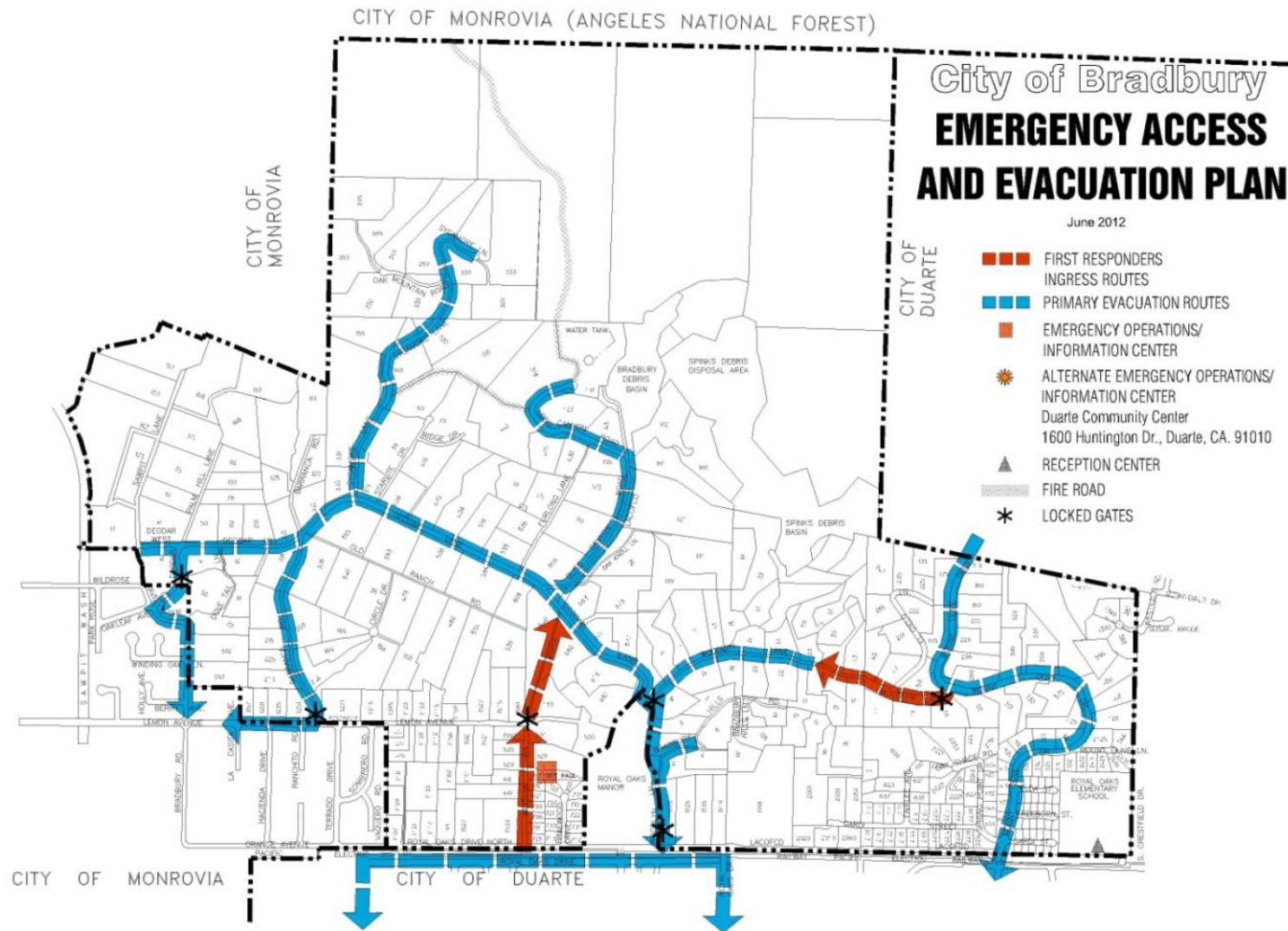


Exhibit H-S Safety No. 4 EMERGENCY ACCESS AND EVACUATION PLAN

Climate Change and Resiliency Planning

As a result of climate change, Bradbury, like other cities in California, may experience more frequent and intense heat waves, drought, wildfires, flooding, and more severe storms and extreme weather events. The impacts of climate change pose an increasing and growing challenge to the safety and well-being of Bradbury's residents. SB 379 is a state law requiring the City to update the Health and Safety Element to address climate change adaptation and resiliency strategies applicable to Bradbury. A Climate Vulnerability Assessment (CVA) has been prepared to identify risks that climate change poses to the City and is attached as Appendix H-S A. Relevant goals, policies, objectives, and actions informed by the CVA have been added to the Health and Safety Element, and a high-level overview of the findings is provided below.

- Wildland fires represent the threat most likely to affect Bradbury as a result of climate change. While most likely to ignite within the CAL FIRE designated FHSZs, the effects of wildfire can adversely impact larger areas, cascading out towards the entirety of Bradbury and the surrounding cities, with smoke, ash, and poor air quality.
- The most vulnerable populations are those living in or adjacent to VHFHSZs within the City. Other vulnerable populations include seniors and people with pre-existing health conditions such as asthma.
- The most vulnerable natural areas are the sensitive hillside areas (and wildlife within these environments) located in the northern portion of the City, which are within the VHFHSZ. This largely undeveloped area contains the most open space and natural landscape in the City and consists of high amounts of often dry foliage that is highly susceptible to fires. As prolonged dry spells are predicted to lengthen, plants, animals, and habitats that receive less and less water are more likely to burn from wildfire, leave the area, or die out from lack of resources.
- The most vulnerable infrastructure is power and energy infrastructure, as well as homes within and bordering the VHFHSZs. Extreme weather and heat conditions can increase the risk of fires, which can lead to the destruction of energy infrastructure such as power lines that are in more remote (and more fire prone) areas. Since energy grids are interconnected and provide energy throughout the region, large parts of the Southern California population are expected to be impacted by distant fires or power outages.
- Regional drought is also a key hazard to Bradbury as the City is served entirely by groundwater sources from the main San Gabriel Basin. Drought may also result in increased tree mortality, which contributes to higher fuel loading and wildfire size and severity. As expected with climate change, droughts are anticipated to increase both in frequency and intensity.

Safety Goals, Objectives, Policies and Action Programs

Safety Goals:

- | | |
|-----------------------|---|
| Safety Goal 1. | To protect the citizens, their property and public facilities from natural and human-caused hazards. |
| Safety Goal 2. | To establish, maintain, and develop awareness on the part of all residents of Bradbury as to how to react and protect themselves and each other in the event of a natural or human-caused hazard or disaster. |
| Safety Goal 3. | To achieve a greater sense of citizen satisfaction with the safety services within the community, through constantly monitoring the effective and efficient staffing of safety service personnel. |
| Safety Goal 4. | To minimize the risk to persons and property due to seismic activity. |
| Safety Goal 5. | To minimize the risk to lives and property due to fire hazards. |
| Safety Goal 6. | To minimize the risk to persons and property due to the use and storage of hazardous materials. |
| Safety Goal 7. | Protect the community from floods and landslides. |
| Safety Goal 8. | Assure that existing and new development addresses fire protection in a proactive and preventative way. |
| Safety Goal 9. | Prevent or minimize personal injury, loss of life, and property damage due to climate hazards and climate-induced secondary impacts. |

Safety Objectives:

- | | |
|----------------------------|--|
| Safety Objective 1. | Prepare the community for expected or unexpected disasters resulting from natural or human causes. |
| Safety Objective 2. | Prepare the residents of Bradbury to be aware of potential hazards and disasters and to be prepared to be self-reliant for at least seven days in the event of a disaster. |
| Safety Objective 3. | Communicate with Bradbury residents through all available media, that safety personnel are properly trained to provide assistance in the event of a disaster. |
| Safety Objective 4. | Implement the City's Hazard Mitigation Plan in a timely manner. |

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|----------------------------|--|
| Safety Objective 5. | Reduce the possibility of hazardous materials becoming a health and safety issue within the community. |
| Safety Objective 6. | Assure that potential flooding and landslide hazards are reviewed during new development. |
| Safety Objective 7. | Ensure that adequate service levels of fire protection are maintained in the City. |
| Safety Objective 8. | Promote a well-prepared City that can effectively overcome natural disasters and scarcity of resources due to climate change. |
| Safety Objective 9. | Demonstrate leadership in local climate planning efforts through a range of tangible policies and actions at the municipal operations level. |

Safety Policies:

- | | |
|-------------------------|--|
| Safety Policy 1. | Coordinate with LACoFD to proactively develop ongoing emergency services training to stay current with best practices and support community programs that train volunteers to assist “First Responders” in the implementation of the Hazard Mitigation Plan programs and Community Wildfire Protection Plan actions. |
| Safety Policy 2. | Implement precautionary measures in high-risk areas to reduce injury and loss of property caused by natural or human-caused hazards. |
| Safety Policy 3. | Review all development proposals for compliance with established hazard avoidance criteria. |
| Safety Policy 4. | Provide adequate levels of service to ensure that the residents are protected to the best of the City’s ability from natural and human-caused disasters. |
| Safety Policy 5. | Cooperate with federal, state and county agencies responsible for the enforcement of all health and safety laws and regulations. |
| Safety Policy 6. | Establish and maintain a variety of media sources to enable interactive safety awareness and preparedness educational opportunities for the residents. |
| Safety Policy 7. | Obtain materials and support the dissemination of written information to all Bradbury households regarding minimizing or avoiding hazards within the home. |

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- Safety Policy 8.** Provide opportunities to continually advise and update community residents regarding actions and activities they should engage in after a significant natural or human-caused disaster.
- Safety Policy 9.** Support continuing review and updating of the City's Disaster Preparedness Program manual.
- Safety Policy 10.** Work closely with adjacent cities, county, state and federal agencies to inform, monitor and communicate the presence of wild animals.
- Safety Policy 11.** Maintain and evaluate the level of safety services available to the community.
- Safety Policy 12.** Regulate development in accordance with state statutes in areas prone to seismic hazards.
- Safety Policy 13.** Continue to support mutual aid / mutual assistance agreements between local, state, and federal firefighting agencies, including the California Master Mutual Aid Agreement.
- Safety Policy 14.** Require that all new development within Bradbury comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards.
- Safety Policy 15.** Provide sufficient fire protection services, firefighting equipment, and firefighting personnel to adequately respond to fire hazards.
- Safety Policy 16.** Coordinate with the City's water purveyor to ensure necessary water supply systems and fire flow for structural fire suppression are provided and maintained.
- Safety Policy 17.** Require adequate Fire Protection Plans and emergency vehicle access for new development in VHFHSZs.
- Safety Policy 18.** Coordinate with LACoFD to identify and incorporate fire resistive building and fire safe site design methods to prevent and minimize damage if new structures are proposed in VHFHSZs on undeveloped land and/or when rebuilding after a fire.
- Safety Policy 19.** Consider fire safe design (i.e. fire-resistant building and site design, materials, and landscaping) for development within Very High Fire Hazard Severity Zones as part of the development review process.

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- Safety Policy 20.** Locate, when feasible, new essential public facilities and infrastructure outside of VHFHSZs, including but not limited to, hospitals and health care facilities, emergency shelters, emergency command centers, emergency communication facilities, and utilities or identify construction methods or other methods to minimize damage if these facilities must be located in VHFHSZs.
- Safety Policy 21.** Work with LACoFD to identify and maintain fire hazard reduction projects, including community fire breaks and vegetation clearance around private and public roads.
- Safety Policy 22.** As part of the LACoFD review process, require ongoing brush management, fuel management/modification, defensible space, fire retardant landscaping, and other project design features for new development located in areas of or adjacent to the VHFHSZs.
- Safety Policy 23.** Coordinate with LACoFD to define minimum standards for evacuation of residential areas in VHFHSZs. If areas with inadequate access/evacuation routes are identified, develop appropriate mitigation measures, improvement plans, and educational programs to ensure safe evacuations.
- Safety Policy 24.** Provide access to potable water for emergency purposes.
- Safety Policy 25.** Regulate and monitor, to the extent possible, the delivery, use and storage of hazardous materials within the City.
- Safety Policy 26.** Require all existing and new development to install and maintain adequate smoke detection systems.
- Safety Policy 27.** Require all new development to install fire sprinkler systems.
- Safety Policy 28.** Require that all new development incorporate sufficient measures to mitigate flood and landslide hazards including but not limited to on-site drainage systems and grading of site to minimize stormwater runoff.
- Safety Policy 29.** Collaborate with local, regional, state and/or federal jurisdictions and agencies on climate resiliency and adaptation strategies.
- Safety Policy 30.** Reduce communitywide greenhouse gas emissions locally by actively supporting regional efforts to reduce greenhouse gases throughout the county.
- Safety Policy 31.** Monitor climate change-related effects with local, regional, state, and/or federal partners to provide information on effectiveness of existing infrastructure and programs.

Safety Implementation Action Program:

The City of Bradbury intends to complete the following items which address the objectives and policies of the Safety Chapter of the General Plan:

- | | |
|--------------------------|---|
| Safety Action 1. | Ensure that the Land Use Element recognizes and addresses seismic threats. |
| Safety Action 2. | Promote public education about fire safety at home. |
| Safety Action 3. | Promote public education about disaster preparedness, with an emphasis on protecting vulnerable and at-risk populations such as seniors and those with limited mobility. |
| Safety Action 4. | Update the hillside development standards to include fire prevention design measures and specific LACoFD standards which will be required for new development. |
| Safety Action 5. | Continue to make emergency and disaster preparedness a community priority. |
| Safety Action 6. | Implement the City's Emergency Operations Plan to ensure the most effective allocation of resources for protection of people and property in time of an emergency, and update and review the Plan annually. |
| Safety Action 7. | City staff to continue to work with LACoFD on brush removal and weed abatement from April to June. |
| Safety Action 8. | Conduct public outreach on wildfire prevention awareness. |
| Safety Action 9. | Promote voluntary tree trimming and brush and weed abatement. If voluntary efforts are not effective, continue to enforce city-mandated tree trimming requirements and coordinate with Code Enforcement on brush and weed abatement when residents fail to mitigate their own fire hazards. |
| Safety Action 10. | Maintain and update the Hazard Mitigation Plan for the City. |
| Safety Action 11. | Continue support and participation with the Public Safety Committee. |
| Safety Action 12. | Work with LACoFD to maintain and regularly update the City's Fire Hazard Severity Zones Map (Exhibit H-S Safety No. 1) for changes in fire hazard severity zones consistent with changes in hazard designations by CAL FIRE. |

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- Safety Action 13.** Work with LACoFD to maintain an ongoing fire inspection program to reduce fire hazards associated with multifamily development, critical facilities, public assembly facilities, industrial buildings, and nonresidential buildings.
- Safety Action 14.** For all new developments, roadways are to be a minimum 20 feet wide and shall include emergency turnarounds with minimum dimensions established in coordination with LACoFD.
- Safety Action 15.** Require all new development in the City's VHFHSZs to meet the most recent version of the California Fire Code and California Building Code. A Fire Protection Plan that describes project specific fuel modification shall be required.
- Safety Action 16.** Modify, as feasible, existing non-conforming development to contemporary fire safety standards, including road standards and vegetation standards.
- Safety Action 17.** Work with CAL FIRE, United States Forest Service, United States Geologic Service, and applicable nongovernmental agencies to create a plan to address post-fire recovery activities and projects that allow burned areas to fully recover and minimize repetitive losses and further damage.
- Safety Action 18.** Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a land use update or amendment.
- Safety Action 19.** Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires.
- Safety Action 20.** Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e. steep slopes, ridge saddles).
- Safety Action 21.** Require all streets, both public and private, to be marked and visible and all street addresses to be posted in plain view.
- Safety Action 22.** Implement necessary actions and programs to improve drought impact preparation.
- Safety Action 23.** Promote plans and programs that support sustainable energy sources.
- Safety Action 24.** Promote the use of sustainable and carbon-neutral energy sources in new development.

Safety Action 25.

Explore using renewable energy and clean generation technologies such as solar, wind, biogas, or fuel cells to power city-owned and operated facilities where feasible.

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EXHIBIT “B”

City of Bradbury

Climate Vulnerability Assessment

September 2023

Prepared by De Novo Planning Group



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A. Introduction

Communities in California are increasingly vulnerable to the effects of climate change. California's Fourth Climate Change Assessment, conducted in 2018, identifies the Los Angeles Region as especially vulnerable to human-induced impacts to the climate since approximately half the population of the state calls the region home.¹ Climate change refers to changes in conditions that result from increased atmospheric greenhouse gas (GHG) concentrations, which are linked to an increase in average global temperature. The increase in global temperature and GHG result in a series of changes to the global climate, including shifts in: seasonal temperature patterns; altered precipitation timing, volume, and location; sea-level rise; ocean acidification due to increased carbon dioxide (CO₂) absorption; and altered severe wind and storm event frequency, severity, and location. These outcomes interact, and the potential consequences may result not only in global climate shifts, but also changes to a variety of characteristics that define biophysical systems and human progress.

What is a Climate Vulnerability Assessment?

The purpose of a Climate Vulnerability Assessment (CVA) is to inform City policies, plans, programs, and guidance to promote effective and integrated action to safeguard from climate change. In addition to increasing global average temperatures, climate change has the effect of intensifying the effects of many natural hazards, adding to concerns otherwise addressed in hazard mitigation planning. Climate change results in an increase in variance of climate patterns. The increase in variance means that extreme events may exhibit changes in frequency, severity, and location. The increased variance therefore creates challenges for hazard planning, which previously used historic recurrence rates to predict future events, and now must incorporate changes to frequency, severity, and location due to climate change influences.

Addressing Climate Change

Climate change can be viewed from two scales: global and local. Addressing climate change relies on two high-level approaches at both scales: mitigation and adaptation. Climate change mitigation involves the reduction of GHG emissions, whereas climate adaptation aims to reduce harm from the effects of a changing climate. At the global scale, mitigation appears as less dependency on fossil fuels and a shift towards renewable energy; at the local scale, mitigation appears as multi-modal and active transportation networks, for one example. At the global scale, climate adaptation can be seen as expanded emergency response teams and climate refugee aid. At the local scale, adaptation can be the preparation taken for inevitable climate-induced emergencies and the spin-off social impacts that could emerge from them. Both approaches at both scales are necessary; however, this document focuses on identifying vulnerabilities and adaptation strategies on the local level within the City of Bradbury.

Regulatory Framework

There are currently numerous laws and regulations set in place in the State of California that are aimed at reducing the impacts of climate change hazards. For decades, California has continued to adopt, update, and amend Senate and Assembly Bills; create monitoring and mitigation programs; and fund state, regional, and local agencies to promote environmental preservation. A list of relevant bills and documents

¹ California's Fourth Climate Change Assessment, 2018. Accessed October 19, 2022. Available at <https://www.climateassessment.ca.gov/>.

adopted by the State, region, and City are included in [Appendix A](#). While these documents create general goals and guidelines for the State to achieve and follow, each municipality is unique and therefore can best thrive and meet environmental regulations in its own unique way. The regulatory documents included in [Appendix A](#) provide a framework for the direction Bradbury should be headed, but it is up to the City to implement programs and designs to reduce the effects of climate change.

Assessing Vulnerabilities

The vulnerability that a community experiences as a result of climate change is a product of its biophysical setting in combination with the characteristics of the community, ranging from its built pattern to social, political, and economic characteristics. Put simply, the level of climate vulnerability can be calculated using the following formula:

$$\text{Exposure} + \text{Sensitivity} - \text{Adaptive Capacity} = \text{Vulnerability}$$

Where:

- **Exposure** refers to the nature and degree to which a system or sub-population is exposed to significant climatic variations.
- **Sensitivity** refers to the degree to which a system or sub-population is affected by climate-related stimuli.
- **Adaptive Capacity** refers to the adaptability of a system or sub-population to adjust to climate change, to moderate potential damages, or to cope with the consequences.

Example:

It is 100 degrees Fahrenheit (exposure) on a playground at a Bradbury elementary school. Inside a classroom, Cindy is a student with a pre-existing condition (sensitivity) that leaves her at risk of hyperthermia; however, the classroom is air conditioned (adaptive capacity), so Cindy is able to continue learning with the rest of the students.

As shown by the example above, many factors are at play when determining the level of climate vulnerability. The California Adaptation Planning Guide identifies five steps in assessing the vulnerability of a community to climate change:

1. **Exposure:** What climate change effects will a community experience?
2. **Sensitivity:** What aspects of a community (people, structures, and functions) will be affected?
3. **Potential impacts:** How will climate change affect the points of sensitivity?
4. **Adaptative capacity:** What is currently being done to address the impacts?
5. **Risk and onset:** How likely are the impacts and how quickly do they occur?

Not only do impacts vary, but vulnerability varies across specific areas and groups. For example, future climate changes, especially increases in extreme heat, are expected to disproportionately burden low-income residents and communities of color across the region. The City of Bradbury is home to an array of people and not all residents are expected to be equally impacted. This CVA describes vulnerabilities in terms of social vulnerabilities and physical vulnerabilities. Social vulnerabilities examine how populations,

communities, and social systems are affected by climate change. Physical vulnerabilities examine how infrastructure, critical facilities, and land are affected by climate change.

B. Climate Impacts and Vulnerability Assessment

An assessment of a community's vulnerability to climate change begins with an understanding of local exposure to climate impacts. In addition, a primary objective of this document is to identify geographic areas, populations, and infrastructure in Bradbury with heightened risk to projected climate impacts. This section first describes the methodology used to obtain climate impact projections, then highlights each major impact projected in Bradbury and focuses on the following questions:

- What is the hazard?
- What is the local exposure?
- Where and when does this impact occur?
 - To what extent will the City be exposed to this impact?
 - Who (or what) is the most vulnerable?
- How does this impact affect or tie into other impacts or hazards?
- How is the City currently addressing this impact?

Methodology

While the science is highly certain that California (and the world) will continue to warm and experience greater impacts from climate change in the future, specific outcomes are inherently uncertain. Future outcomes vary depending on the level of global GHG emissions. Accordingly, most climate models include a range of possible scenarios based on the level of global GHG emissions.

This document pulls data, and data analysis, from California's Fourth Climate Change Assessment published in 2018. The data discussed in the Assessment, derived from 32 coarse-resolution (~ 100 km) global climate models (GCMs), were bias corrected and downscaled using the Localized Constructed Analogues (LOCA) statistical method. The data cover 1950-2005 for the historical period and 2006-2100 for two future climate projections using medium and high GHG and aerosol emissions scenarios.

For City-specific predictions, this document uses climate modeling from Cal-Adapt – a tool that came about as a key recommendation of the 2009 California Climate Adaptation Strategy and created with oversight from the California Energy Commission and California Strategic Growth Council. Cal-Adapt makes two predictions for the period of 2006 to 2100 using medium and high GHG and aerosol emissions scenarios. These scenarios are known as Representative Concentration Pathways (RCP). Each RCP represents a standardized set of assumptions of humanity's trajectory in the coming years. The Medium Emissions Scenario (RCP 4.5) represents a mitigation scenario where global CO₂ emissions peak by 2040 and then decline. Statewide, temperature is projected to increase 3-7°F (or 2-4°C) for this scenario by the end of this century. The High Emissions Scenario (RCP 8.5) represents a scenario where CO₂ emissions continue to rise throughout the 21st Century. Statewide, temperature is projected to increase approximately 7-12°F (or 4-7°C) by the end of this century. Precipitation shows fewer wet days, wetter winters, drier springs and autumns, and an increase in dry years as well as maximum precipitation in a single day. Cal-Adapt also specifies that its data is derived from the 32 LOCA downscaled climate projections generated to support California's Fourth Climate Change Assessment, observed historical data

is derived from Gridded Observed Meteorological Data, and the data presented are aggregated over all LOCA grid cells that intersect Bradbury's boundaries.

In addition to the range of potential outcomes, climate change can produce a variety of impacts depending on location. California is expected to experience warmer temperatures, increased drought, and more extreme weather events (IPCC, 2007). This is why climate change projections include both drought and increased precipitation leading to flooding. The range of impacts anticipated in Bradbury are summarized below.

The key hazards addressed in this Climate Vulnerability Assessment are those that pose a particular threat to the City. Various City documents were consulted to identify the key hazards. The Los Angeles County Climate Vulnerability Assessment and the Los Angeles Countywide Sustainability Plan (*Our County*) were consulted as well. The Los Angeles County CVA provides direction and information that this Bradbury CVA uses as a *jumping off point*. For consistency, and to better understand regional impacts, much of the regional discussion included here is inspired by the Los Angeles County CVA.

Impacts

Extreme Heat and Weather

What is it?

Climate change alters seasonal temperature patterns. Effects can include changes in average temperature, the timing of seasons, and the degree of cooling that occurs in the evening. In addition to new seasonal temperature patterns, extreme events such as heat waves are projected to occur more frequently and/or last for longer periods of time. In California, temperature increases are expected to be more pronounced in the summer and in inland areas, and many areas are losing even more of the already moderate winter conditions. Phenomena such as heat waves are projected to increase not only in frequency but in spatial extent (CNRA, 2009). The degree of change experienced partially depends on global GHG emissions and atmospheric concentrations. By 2050, however, temperature increases between 1.8°F to 5.4°F are projected under both emissions scenarios examined by the State (CNRA, 2009).

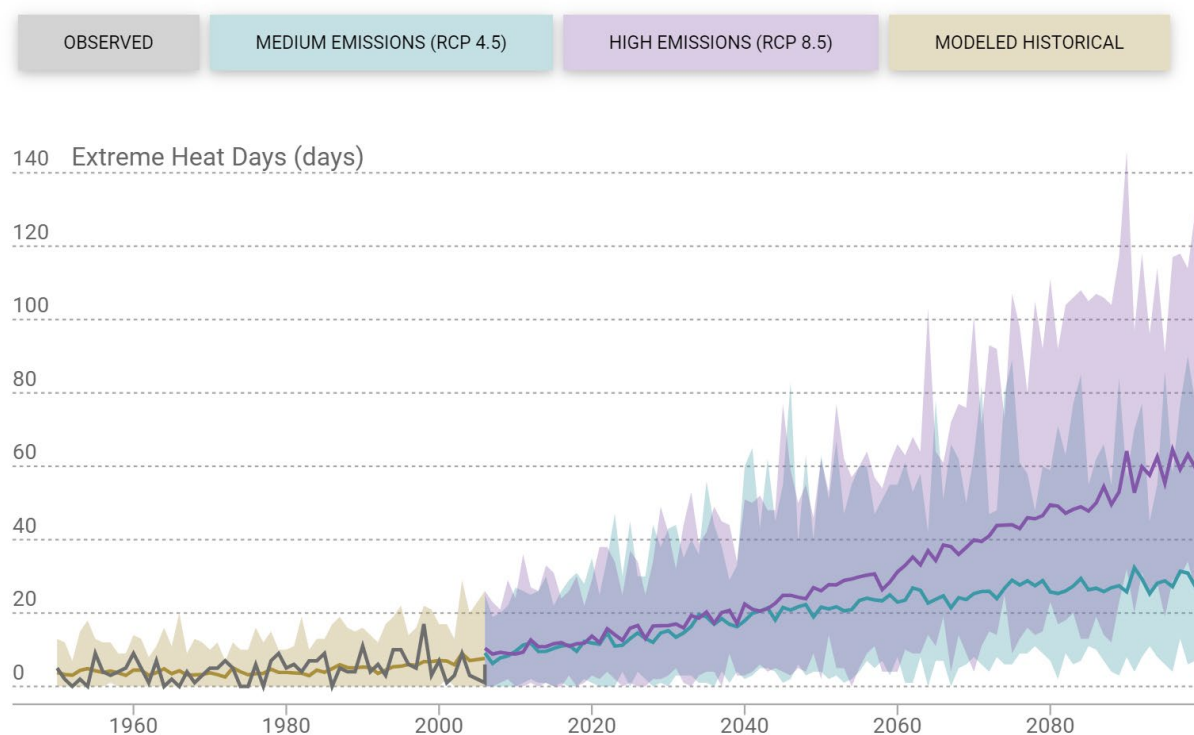
Extreme heat is projected to increase in frequency, severity, and duration, with the largest increases occurring in the Santa Clarita and San Fernando Valleys in the Greater Los Angeles County area. In addition to hot days, extended periods of extreme temperature, known as heat waves, can multiply the impacts of extreme heat. LA County has begun to experience more frequent, more severe, and longer heat waves. Countywide heat waves are projected to increase in frequency and duration by mid-century. By mid-century, projections suggest that most of the County will likely shift to moderate or high exposure to extreme heat, with the majority of LA County in high exposure by mid-century (LACCSO, 2021).

Local Exposure/Environment

Extreme heat and human safety, human health, and human productivity are inextricably linked (LACCSO, 2021). Temperatures in Bradbury are generally representative of those found throughout Southern California. In terms of extreme weather, extreme heat is looked at over other extreme weather and storm patterns due to the impact heat has within the City comparatively. Bradbury is not in a location subject to dangerous storms (hurricanes, tornados, blizzards, etc.), tsunamis, or intense winters. The average annual high temperature calculated from January 1917 to June 2016 for the San Gabriel Canyon area is 78.2°

Fahrenheit (°F), with higher temperatures in summer and early fall (June through October) reaching up to an average of 91.7°F. The average annual low temperature is 52.8°F and can reach an average low temperature of 47.2°F (Dudek, 2022). *Figure 1* shows the number of days in a year when the daily maximum temperature is above a threshold temperature of 100.3°F. This threshold temperature is the 98th percentile value of historical daily maximum/minimum temperatures (from 1961–1990, between April and October) observed in Bradbury.

Figure 1: Extreme Heat Days in Bradbury



Source: Cal-Adapt. Accessed October 7, 2022. Available at <https://cal-adapt.org/tools/local-climate-change-snapshot/>

As shown in *Figure 1*, climate change is expected to increase the frequency of extreme heat events per year in Bradbury. *Table 1* supports *Figure 1* and demonstrates this by showing the average number of days exceeding the 98th percentile summertime (April to October) high-heat threshold in the City. The Baseline (1961 to 1990) modeled historical data shows an average of four days that exceeded the 98th percentile high-heat threshold. By mid-century (2035 to 2064), the number of days exceeding 98th percentile high-heat threshold is expected to quintuple from the Baseline average (from 4 to 21 days) under the Medium Emissions scenario (RCP 4.5) and increase by three weeks (from 4 to 26 days) under the High Emissions scenario (RCP 8.5). By the end of the century (2070 to 2099), the average number of days is expected to increase by 23 days (from 4 to 27) and 47 days (from 4 to 51) past Baseline for Medium and High Emissions scenarios, respectively.

Table 1: Average Number of Days Exceeding 98th Percentile Summertime (Apr-Oct) High-Heat Threshold

Time Period	Scenario	30yr Average	30yr Range	Change from Baseline
Baseline (1961-1990)	Modeled Historical	4 days*	3-5 days	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	21 days	13-48 days	+17 days
	High Emissions (RCP 8.5)	26 days	17-53 days	+22 days
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	27 days	19-66 days	+23 days
	High Emissions (RCP 8.5)	51 days	36-102 days	+47 days

Source: Cal-Adapt. Accessed October 7, 2022. Available at <https://cal-adapt.org/tools/local-climate-change-snapshot/>

* Observed 30-year average from 1961 to 1990: 4 days

Who is Most Vulnerable?

Everybody can be affected by extreme weather and heat, but certain groups are more sensitive and thus more vulnerable. Social vulnerabilities include people with pre-existing health conditions; children and older adults; people who depend on walking, biking, or transit to get around; and people who work outdoors. Children are at a higher risk for being adversely affected by extreme weather because they spend much of their time outdoors playing or exercising thereby increasing their body temperature already; increased activity in more extreme weather more easily leads to dehydration and skin burning. Older adults are considered highly vulnerable to extreme heat and weather because a human body's regulatory and immune systems tend to deteriorate with age and are not as prepared to be resilient against drastic changes. The Southern California Association of Governments (SCAG) reports that Bradbury residents under the age of 20 comprise approximately 17 percent of the population as of 2018; and seniors (65 and above) make up approximately 22 percent of the City population (SCAG, 2019).

Furthermore, extreme heat can cause uncomfortable and even dangerous conditions for outdoor physical activity, making it harder for people to get the recommended amount of exercise and potentially leading to increased risk of long-term health effects related to a sedentary lifestyle. The health risks associated with exposure to extreme heat are intensified when compounded with other demographic factors. Hispanic and Latino people are overrepresented in other vulnerable populations, like outdoor workers and undocumented individuals. Approximately 12 percent of the Bradbury population is Hispanic or Latino (SCAG, 2019). Respite from heat is critical to outdoor workers to mitigate the potential health impacts of extreme heat. For this reason, both place of residence and place of occupation are important in understanding the overall risk (LACCSO, 2021).

Air pollution is linked to asthma and cardiovascular disease, both of which increase vulnerability to extreme heat. In return, extreme heat can contribute to and exacerbate the formation of ground-level ozone, which triggers asthma attacks (LACCSO, 2021). According to the California Health Interview Survey

(CHIS), organized by the UCLA Center for Health Policy Research, over 17 percent of the adult Bradbury population (18+) has been diagnosed with asthma at some point; this is similar to the rate found throughout the state which is approximately 16 percent.

Physical vulnerabilities include energy, water, and transportation infrastructure. As temperatures rise, an increased demand for cooling can cause strain on the energy grid and lead to blackouts. The effects of heat on the physical energy grid such as power lines can also cause strain and lead to fires. Parks and open space are also affected because extreme heat can harm vegetation and wildlife, causing the northern vast open spaces within the City to be highly vulnerable. Heat can cause transportation delays or malfunctions, or damage transportation infrastructure such as roads.

Flooding

What is it?

Increased flooding occurs when rain falls over a shorter period, even if there is less overall rain. Vegetated and pervious surfaces such as grass and soil do not have enough time to absorb the rainfall, overwhelming stormwater infrastructure capacity. In combination, changes in temperature and precipitation may exacerbate impacts. Heavy stormwater runoff can contaminate the surrounding bodies of water with environmentally and biologically harmful bacteria (Cal EMA, 2012). Intense rainstorms could require evacuation and temporary or permanent displacement of people and result in property damage or loss.

Flood-prone zones typically include areas within river floodplains or adjacent to drainage systems, low-lying areas where heavy rainfall can collect, and areas with inadequate storm drain infrastructure. Inland flooding can be exacerbated by high amounts of impermeable surfaces (LACCSO, 2021).

Data on exposure to extreme precipitation is limited to annual rainfall averages and does not capture the extreme precipitation events that can cause the most damage. Exposure to inland flooding is based on mapping of floodplains created by the Federal Emergency Management Agency (FEMA) (LACCSO, 2021).

Local Exposure/Environment

Flooding has not been a serious hazard to Bradbury in several decades, and the risk of disastrous flooding in the City is considered minimal. Bradbury does not lie within a 100- or 500-year floodplain, as delineated by FEMA. However, according to the City's Local Hazard Mitigation Plan (2019), the potential for a localized flood event still exists within Bradbury. The elevated nature of the City removes Bradbury from flood danger from the San Gabriel River Channel (EPC, 2019). The built areas of the City are in "Flood Zone X" and "Flood Zone D". Zone X is defined as the area outside the 500-year flood and protected by levee from the 100-year flood. Zone D is defined as areas in which flood hazards are undetermined (i.e. no analysis of flood hazards has been conducted), but possible.

The average annual precipitation for the area is 22.28 inches, with the most rainfall concentrated in December (3.49 inches), January (4.40 inches), February (5.06 inches), March (3.50 inches), and April (1.69 inches). Rainfall is much less during June (0.19 inches), July (0.04 inches), and August (0.11 inches) (Dudek, 2022). Actual rainfall in the Southern California region tends to fall in large amounts during sporadic and often heavy storms rather than consistently over storms at somewhat regular intervals. In short, rainfall in Southern California might be characterized as feast or famine within any single year (EPC, 2019).

Much of Bradbury has steep topography and a minimal risk of flooding. However, there are a few low-lying areas in the City where stormwater can gravitate towards and build up. The steep slopes found throughout the City allow stormwater to gain momentum and pick up, and move, debris. Landslides and mudslides are a second type of risk in wildland-urban interface areas at the foothills of mountain ranges where there may be steep slopes. The congruence of post-wildfire debris and extreme precipitation in these sloped areas can have devastating impacts on developments in the down-slope areas (LACCSO, 2021).

The Los Angeles County Flood Control District maintains the City's public storm drain system. Channels and storm drain pipes comprise the flood control network. According to the General Plan Health and Safety Element, large agriculturally zoned and developed parcels either retain surface runoff on site or it is directed to public facilities by a system of privately owned and maintained drainage swales. Otherwise, the existing storm drain system collects runoff from streets and small parcels of land.

Localized flooding may occur in low spots or where infrastructure is unable to accommodate peak flows during a storm event. In most cases, water dissipates quickly after heavy rain ceases. The Bradbury Debris Basin and the Spinks Debris Basin and check dams also provide the City with protection from large scale floods. The City works with the U.S. Army Corps of Engineers and the Los Angeles County Flood Control District to ensure maximum functionality of all flood control facilities (EPC, 2019).

The City of Bradbury is also a participant in the National Flood Insurance Program (NFIP). Communities participating in the NFIP must adopt and enforce minimum floodplain management standards, including identification of flood hazards and flooding risks. This program helps incentivize people to develop less on historic floodplains.

While California does not see the average annual precipitation changing significantly in the next 50-75 years, precipitation will likely be delivered in more intense storms and within a shorter wet season (Cal-Adapt, 2022). [*Table 2*](#) shows the predicted increase in maximum one-day rainfall in Bradbury over the next century. The Baseline average is approximately 2.6 inches in one day. During the middle of the century (2035-2064), the average rainfall within a day is expected to increase approximately 0.2 inches under both the Medium and High Emissions scenarios. By the end of century (2070-2099), rain is predicted to fall an additional 0.3 inches under the Medium Emissions scenario and an additional 0.5 inches in one day under the High Emissions scenario. While these may not seem like exceptional increases on their own, the data must be observed on a larger scale and compounded with other climate change phenomena to predict the impact on the City and on the region.

Table 2: Maximum One-Day Precipitation

Time Period	Scenario	30yr Average	30yr Range	Change from Baseline
Baseline (1961-1990)	Modeled Historical	2.66 inches	2.26-3.01 inches	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	2.83 inches	2.34-3.31 inches	+0.17 inches
	High Emissions (RCP 8.5)	2.89 inches	2.38-3.48 inches	+0.23 inches
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	2.93 inches	2.48-3.43 inches	+0.26 inches
	High Emissions (RCP 8.5)	3.11 inches	2.41-4.15 inches	+0.48 inches

Source: Cal-Adapt. Accessed October 7, 2022. Available at <https://cal-adapt.org/tools/local-climate-change-snapshot/>

* Observed 30-year average from 1961 to 1990: 2.795 inches

Agencies such as the Los Angeles County Public Works Stormwater Engineering Division have created plans that prepare the County, and subsequently the City, for potential flooding hazards (LA County Public Works EPD, 2022). The Los Angeles County Comprehensive Floodplain Management Plan aims to evaluate the impacts of urban stormwater discharge on receiving waters and communities. The Floodplain Management Plan is an important component of the County's participation in the National Flood Insurance Program and the Community Rating System (CRS), which are administered by FEMA (Tetra Tech, 2021).

The Municipal National Pollutant Discharge Elimination System (NPDES) Permit is issued to the County of Los Angeles and 84 cities (minus Avalon, Lancaster, Long Beach, and Palmdale) by the California Regional Water Quality Control Board, Los Angeles Region. The Los Angeles County Public Works Stormwater Engineering Division is the agency assigned as the Principal Permittee. The Division's goal is to improve the overall quality of life for residents of Los Angeles County (LA Public Works EPD, 2022).

Who is Most Vulnerable?

Flooding impacts generally are not linked to specific populations, such as seniors, children, or individuals with disabilities. However, older housing inventories are sometimes located in low-lying, more flood-prone areas, causing the units to be more susceptible to extreme conditions such as flooding. Beyond impacts to buildings, shelters, and occupants, inland flooding and extreme precipitation have the potential to impact transit and road infrastructure, causing service delays or shutdowns and road closures. One indicator of an area's potential for flooding is its ratio of permeable surfaces to impermeable surfaces. Maintaining as much permeable surface as possible by using permeable materials for new development can help ensure that stormwater will be absorbed into the ground and will filter through the soil to replenish groundwater (LACCSO, 2021).

Drought

What is it?

California's highly variable climate is susceptible to prolonged dry spells. A warming climate will compound drought impacts, as evidenced during recent precipitation deficits in the 2000s Southwest drought (Colorado River Basin), and during the 2012-2015 drought in California and neighboring states (Pierce, et al, 2018). Furthermore, recent research suggests that extended drought occurrence ("mega-drought") could become more pervasive in future decades (Pierce, et al, 2018). Drought is a climate hazard for which census tract-level mapping is not possible. The increase in frequency of transition between wet and dry extremes – or precipitation whiplash – makes the drought-flood cycle more dramatic in the Southern California region (LACCSO, 2021).

In addition to direct impacts on water supply, drought creates dry conditions that can lead to secondary impacts, including but not limited to: increased wildfire risk, reduced evapotranspiration (and thus less ability to mitigate periods of extreme temperatures), damage to habitats and vegetation, and higher volumes of dust. This phenomenon can quickly remove moisture from the soil, leading to compacted soil. In the case of a severe rain event, compacted soil will not allow for infiltration. Collectively, these conditions will contribute to decreased air quality and increased public health issues across LA County (LACCSO, 2021).

Drought vulnerability can be exacerbated by single-source dependency, increased groundwater contamination risk, water from small service providers, and location in areas with a projected increase in extreme heat days. Decreases in precipitation, from drought, and evaporation, caused by higher temperatures, may increase the concentration of pollutants and salinity in streams, reservoirs, and groundwater. More frequent and intense periods of drought could reduce the availability of imported water and drive an increasing use of groundwater. If not managed sustainably, groundwater overdrafts can permanently diminish aquifer capacity (LACCSO, 2021).

Local Exposure/Environment

Potable water is provided to the City by California American Water Company. According to California American Water, the City is served entirely by groundwater sources from the main San Gabriel Basin (EPC, 2019). The California American Water Company also supplies water to service fire hydrants via underground pipes (General Plan, 2014). In order to replace aging infrastructure and improve water delivery service, California American Water upgraded 13,300 feet of water distribution mains in the cities of Bradbury, Duarte, and the Baldwin Hills area in unincorporated Los Angeles County in 2013 (EPC, 2019).

There is no history of severe drought (e.g., restaurants with restricted hours, emergency water distribution to residents, etc.) within the City of Bradbury. However, the City is designated on the U.S. Drought Monitor as experiencing an "exceptional drought". This designation comes from a combination of a significant decrease in rain combined with water supply restrictions resulting from the statewide California drought. These conditions were increasingly evident from 2012 to early in 2017 (EPC, 2019).

Table 3 shows the differences in maximum dry spell lengths in Bradbury from Baseline measurements to predicted future variations. The Baseline scenario states that the 30-year average length of a dry spell was approximately 110 days. Dry spells are predicted to increase to six to eight days over Baseline conditions by the middle of the century (2035-2064), and seven to 15 days by the end of the century (2070-2099).

Table 3: Maximum Length of Dry Spell

Time Period	Scenario	30yr Average	30yr Range	Change from Baseline
Baseline (1961-1990)	Modeled Historical	108 days	95-120 days	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	116 days	88–145 days	+8 days
	High Emissions (RCP 8.5)	114 days	81-143 days	+6 days
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	115 days	93-133 days	+7 days
	High Emissions (RCP 8.5)	123 days	77–162 days	+15 days

Source: Cal-Adapt. Accessed October 7, 2022. Available at <https://cal-adapt.org/tools/local-climate-change-snapshot/>

* Observed 30-year average from 1961 to 1990: 110 days

Who is Most Vulnerable?

Extreme drought (and heat) decreases soil moisture and increases plant mortality. Plant die-offs cause a domino effect by reducing available shade and evaporative cooling, thereby raising surrounding temperatures and reducing the thermal comfort of pedestrians. The generally undeveloped ranch lands found throughout the City would be subject to impacts from drought conditions, and therefore contribute to the domino effect of reducing cooling and moisture retention.

People with pre-existing respiratory conditions are extremely vulnerable. In the absence of rainfall during prolonged periods of drought, the region could experience increased concentrations of resuspended road particulates (dust), which have adverse respiratory impacts (Hall, et al. 2018).

Another impact of drought on people in LA County is the increasing prevalence of Valley fever. Valley fever is a disease caused by inhaling fungus spores carried in soil dust. Arid and semiarid landscapes, dust storms, and warmer temperatures all contribute to conditions that lead to increases in Valley fever. The number of reported cases of Valley fever in California has steadily and significantly increased over the past 20 years. Populations at greater risk of severe disease from Valley fever include people who are Black or Filipino, older adults, pregnant women, infants, and people with diabetes or conditions that weaken the immune system. People who live or work in areas where soil is disturbed, such as near farming operations, are at higher risk of exposure (LACCSO, 2021).

Potential drought hazards can be curbed through proactive water management. Noting that all water used within the City is sourced from groundwater, water consumption, whether it be for personal, recreational, or agricultural use, must be used at a sustainable rate. To help protect this resource, Bradbury can enact varying water restrictions. Some water restrictions in place in other cities and counties in California include personal and individual restrictions and limitations or increased cost. Other restrictions are designed to limit commercial and industrial water use and water waste.

Wildland Fire

What is it?

As California is expected to experience increased temperatures and reduced precipitation, there will likely be more frequent and intense wildfires and longer fire seasons. Fires spread more quickly on dry, windy days and move more easily in an uphill direction and in areas with higher-density vegetation. Wildfires are a natural and important part of the ecosystem but can become more intense and dangerous as a result of climate change and land management. Wildfires are unplanned, naturally occurring fires and may be caused by lightning, accidental human ignitions, arson, or escaped prescribed fires. Weather is one of the most significant factors in determining the severity of fires; natural fire patterns are driven by conditions such as drought, temperature, precipitation, wind, vegetation, and fuel (i.e. biomass) availability. Wildfires pose a great threat to life and property, particularly when they move from forest or rangeland into developed areas.

Climate change is projected to increase the frequency of wildfire events, the extent of burned areas across California, and the duration of wildfire seasons. Wildfire seasons are projected to begin earlier in the spring due to drier and warmer spring conditions on average, potentially requiring longer periods for firefighting services. Greater inter-annual variability in temperature and precipitation may also affect wildfire intensity. For example, multiple wet years can result in larger fuel buildup in landscapes. This may result in increasingly intense and frequent wildfires, if followed by drought years. Wildfire risk will also vary depending on population growth and land use characteristics, including rates of residential expansion and infrastructure into fire prone areas over the next century.

Local Exposure/Environment

Bradbury's location at the base of the San Gabriel Mountains creates a wildland-urban interface that makes Bradbury more susceptible to wildfires than cities that do not border the foothills. In fact, due to its weather, topography, and native vegetation, the majority of Los Angeles County is at risk from wildland fires (EPC, 2019). The San Gabriel Mountains, largely covered by the Angeles National Forest, have the highest degree of wildfire risk. On average, the San Gabriel Mountains are projected to experience an increase in wildfire burn area of approximately 40 percent and 50 percent in 2050 and 2080, respectively, under the RCP 8.5 scenario. By mid-century, wildfire events in LA County and across the state are projected to be considerably larger, more frequent, and more destructive (LACCSO, 2021).

The extended droughts characteristic of California's Mediterranean climate result in large areas of dry vegetation that provide fuel for wildland fires. Furthermore, the native vegetation of the region typically has a high oil content that makes it highly flammable. The area is also intermittently impacted by Santa Ana winds – the hot, dry winds that blow across southern California in the spring and late fall (EPC, 2019).

The State has charged CAL FIRE with the identification of Fire Hazard Severity Zones (FHSZ) within State Responsibility Areas. In addition, CAL FIRE must recommend Very High Fire Hazard Severity Zones identified within any Local Responsibility Areas (LRAs). The FHSZ maps are used by the State Fire Marshall as a basis for the adoption of applicable building code standards. [Figure 2](#) shows Fire Hazard Severity Zones within Bradbury (CAL FIRE, 2022). [Figure 2](#) illustrates that a majority of the City is considered to be within a Very High Fire Hazard Severity Zone; the VHFHSZ covers nearly all of the City of Bradbury, with the exception of the southeast and southwest corners of the City. The LACoFD is the responsible agency for fire protection within the City's VHFHSZ and follows the CAL FIRE VHFHSZ designation. The City abuts lands where the responsibility for fire protection lies with the Federal or State of California (FRA or SRA)

(Dudek, 2022). The closest fire station to the City is LA County Fire Department Station #44; it is located less than one mile (approximately 0.5 miles) directly south of Bradbury, in the City of Duarte.

The City and the surrounding landscape exhibit a complex wildfire environment that presents a significant risk to public and firefighter safety and the built and natural environment. This region of the San Gabriel Mountains has been subject to numerous damaging wildland fires, is influenced by local extreme wind and weather conditions (including Santa Ana wind events), has steep and varied terrain with a mosaic of different vegetation types, and is characterized by wildland-urban interface (WUI) development patterns that can exacerbate wildfire risk (Dudek, 2022).

The wildland-urban interface area of Bradbury runs across the entire north border of the City and includes populated residential properties. Almost all streets north of Royal Oaks Drive North in the City are considered to be in the Very High Fire Severity Hazard Zone and are at significant risk in the event of a wildland fire. Areas in the southern and western portions of the City are within the Moderate and/or High Fire Hazard Zone (EPC, 2019).

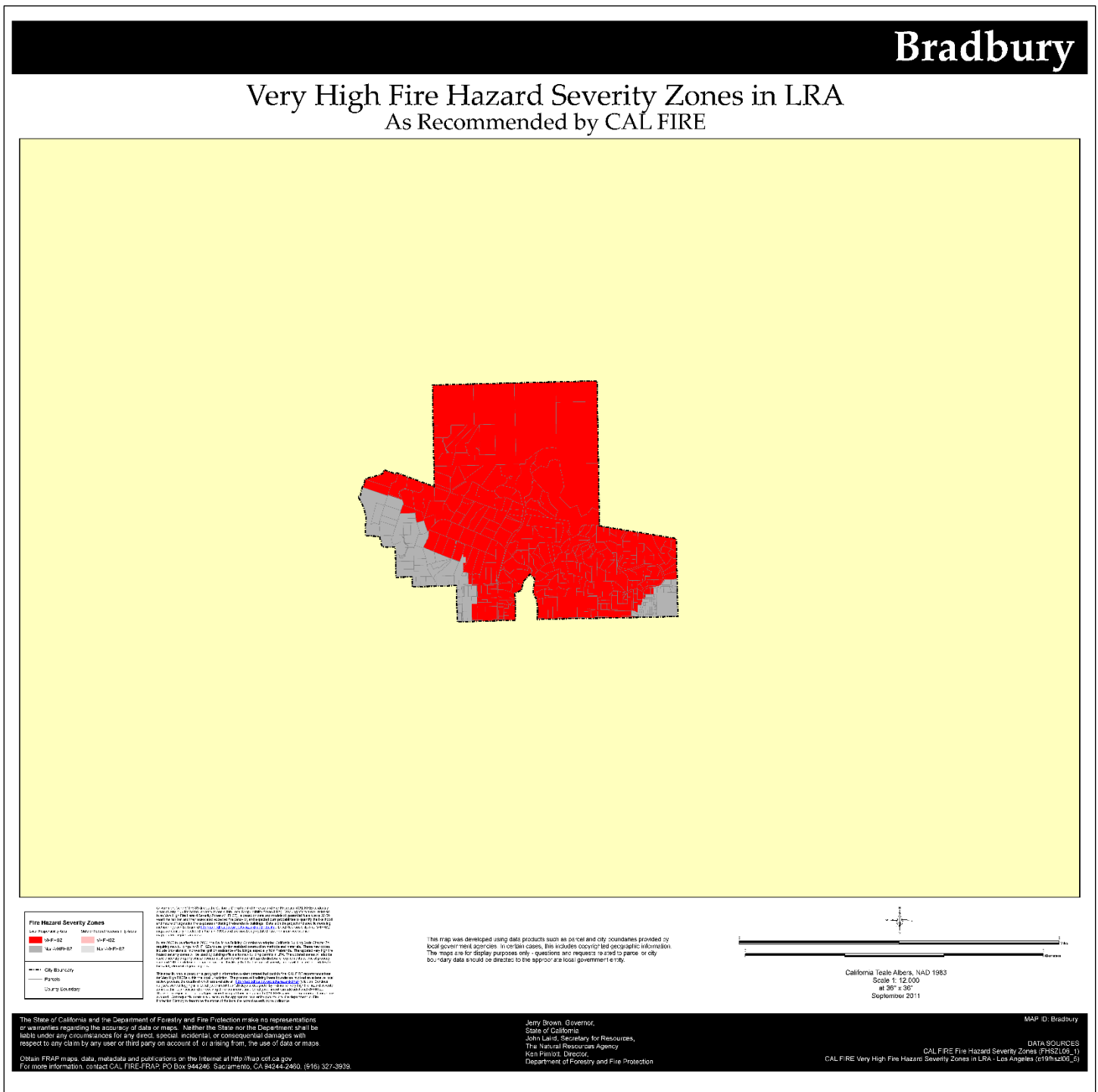
Table 4 projects the average annual area burned over the next century in Bradbury. As shown, the City is expected to burn approximately four to ten acres more during the middle of the century (2035-2064) compared to the Baseline acreage. Similarly, the end of the century expects to see approximately the same number of acres (an additional seven to nine acres compared to the Baseline averages) burn.

Table 4: Average Annual Area Burned

Time Period	Scenario	30yr Average	30yr Range	Change from Baseline
Baseline (1961-1990)	Medium Emissions (RCP 4.5)	64.6 acres	59.4-67.0 acres	-
	High Emissions (RCP 8.5)	60.7 acres	54.9-62.8 acres	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	68.5 acres	62.9-75.8 acres	+3.9 acres
	High Emissions (RCP 8.5)	70.8 acres	60.9-77.4 acres	+10.1 acres
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	72.0 acres	68.7-77.0 acres	+7.4 acres
	High Emissions (RCP 8.5)	69.7 acres	63.3-74.2 acres	+9.0 acres

Source: Cal-Adapt. Accessed October 7, 2022. Available at <https://cal-adapt.org/tools/local-climate-change-snapshot/>

Figure 2: Very High Fire Hazard Severity Zones in Bradbury



Source: CAL FIRE, 2022.

It is crucial that transportation routes are able to safely and effectively operate in times of emergency. The City of Bradbury is comprised of 3.2 miles of public streets and privately owned and maintained roads, and does not intersect with any major freeways or highways. The nearest freeway access to the City includes the Mt Olive Drive/Huntington Drive ramps at the I-605/I-210 freeway interchange. Additional freeway access is provided by the Buena Vista Street and Mountain Avenue off-ramps on the I-210 freeway. The principal east-west major roadway that serves the City of Bradbury is Huntington Drive located in the City of Duarte, one-quarter mile to the south. This highway has an interconnected system of traffic signals which provides and maintains an efficient and reasonable flow of traffic. Royal Oaks Drive, an east-west secondary highway, is located at the City's southerly boundary (EPC, 2019).

Who is Most Vulnerable?

Vulnerable populations include those that live within the Fire Hazard Severity Zones. As depicted in [Figure 1](#), nearly all land within Bradbury city limits is considered to be a Very High Fire Hazard Severity Zone. Almost all streets north of Royal Oaks Drive North in the City are considered to be in the VHFHSZ and are at significant risk in the event of a wildland fire. Further, areas in the southern and western portions of the City are considered a Moderate and/or High Fire Hazard Zone (EPC, 2019). Safe and adequate evacuation plans are crucial to ensuring that impacts are as minimal as possible. Individuals with physical disabilities or who live in isolation may have difficulty evacuating. The popular ranch-lifestyle found throughout Bradbury indicates that residents own several animals that are oftentimes larger, such as horses. Larger animals require equipment, such as trailers, for safe transportation. Ranch and farm equipment is often larger, heavier, and slower than a standard vehicle. When planning and preparing emergency evacuation operations, these factors must be taken into account.

Wildfires are big contributors to air pollution in the western United States and are responsible for an estimated 70 percent of PM 2.5 emissions during periods when fine particulate matter pollution levels are above the EPA standard. Wildfire-generated particulate matter are linked to respiratory complications like asthma, chronic obstructive pulmonary disease, pneumonia, bronchitis, and other infections. Wildfire can have grave impacts on people's livelihoods, homes, and health (LACCSO, 2021). Especially vulnerable people include individuals with pre-existing health conditions, such as asthma, who are more sensitive to hazardous air. The percentage of people diagnosed with asthma in Bradbury is similar to the rates in LA County; approximately 17 percent of Bradbury residents 18 years and older and 16 percent of LA County residents 18 years and older have been diagnosed with asthma at some point in their lives.

Wildfire smoke can travel great distances and affect people far from a wildfire's location (LACCSO, 2021). Bordering areas are highly prone to wildfires, and therefore the City is exposed to a threat from wildfires originating outside the City (EPC, 2019). Starting in 2008, the State of California began integrating wildfire protections and material requirements into building codes to ensure that newly constructed buildings or major renovations meet certain safety standards. Although these code requirements do not nullify the potential risks, these standards minimize the potential impacts on a building and its occupants. Communities in LA County with high wildfire exposure and old buildings have high risk of wildfire damage. These include Bradbury, Azusa, Glendora, Arcadia, Monrovia, and Sierra Madre – all communities along the San Gabriel Valley foothills (LACCSO, 2021).

In addition to personal impacts, wildfires can cause major community-wide disturbances, like evacuations, power outages, economic losses, road and school closures, losses to biodiversity and the natural

environment, and disruptions to recreational activities (LACCSO, 2021). Vulnerable infrastructure includes energy infrastructure (fires in other areas could cause damage to power plants or power lines causing blackouts), communications, and water (water quality reduced due to ash, etc.). Natural habitats and plants and animals are extremely vulnerable to wildfires; the foothills and open spaces found in, and surrounding, the City provide homes to plant and animal species, which are susceptible to fire hazards. Plant and animal life is at an even higher risk due to the fact that Bradbury is a wildland-urban interface.

Windstorm

What is it?

The combination of windspeed, topography, climate, and temperature can create deadly impacts under the right conditions. Hazardous wind events can include windstorms, tornados, or microbursts.

Tornadoes are spawned when there is warm, moist air near the ground, cool air aloft, and winds that speed up and change direction. An obstruction, such as a house, in the path of the wind causes it to change direction. This change increases pressure on parts of the house, and the combination of increased pressures and fluctuating wind speeds creates stresses that frequently cause structural failures (EPC, 2019).

Unlike tornados, microbursts are strong, damaging winds which strike the ground and often give the impression a tornado has struck. They frequently occur during intense thunderstorms. The origin of a microburst is downward moving air from a thunderstorm's core. But unlike a tornado, they affect only a small area (EPC, 2019). When the microburst wind hits an object on the ground such as a house, garage, or tree, it can flatten the buildings and strip limbs and branches from the tree. After striking the ground, the powerful outward running gust can wreak further havoc along its path. Damage associated with a microburst is often mistaken for the work of a tornado, particularly directly under the microburst. However, damage patterns away from the impact area are characteristic of straight-line winds rather than the twisted pattern of tornado damage. Tornados, like those that occur every year in the Midwest and Southeast parts of the United States, are a rare phenomenon in most of California with most tornado-like activity coming from microbursts (EPC, 2019).

Local Exposure/Environment

Strong winds and topography of the area create the regional Santa Ana winds, which can result in disaster conditions, the most common being fire fanned by the high winds. These winds commonly occur between October and February, with December having the highest frequency of events. Summer events are rare. A Santa Ana wind event manifests as a dry northeasterly wind originating from the Great Basin and upper Mojave Desert. As the wind channels through the mountain passes and canyons of Southern California, the wind velocity increases. Wind speeds are typically 35 knots through and below passes and canyons with gusts to 50 knots. Stronger Santa Ana winds have gusts greater than 60 knots over widespread areas, and gusts greater than 100 knots in favored areas. Frequently, the strongest winds occur during the night and morning hours due to the absence of a sea breeze. The sea breeze, which typically blows onshore daily, can moderate the Santa Ana winds during the late morning and afternoon hours. Santa Ana winds are an important forecast challenge because of the high fire danger associated with them – with Santa Ana winds driving wildfire flames, the speed and reach of the flames is greater than in times of calm wind conditions (EPC, 2019).

Based on local history, most incidents of high wind in the City of Bradbury are the result of the Santa Ana and El Niño related wind conditions. While high impact wind incidents are not frequent in the area, significant wind events and sporadic tornado activity have been known to negatively impact the City (EPC, 2019).

Severe windstorms pose a significant risk to life and property in the City of Bradbury by creating conditions that disrupt essential systems such as public utilities, telecommunications, and transportation routes. High winds can and do occasionally cause tornado-like damage to local homes and businesses in and near the community. High winds have destructive impact, especially to trees, power lines, and utility services (EPC, 2019).

A windstorm in late November 2011, which caused winds in excess of 90 mph in the Pasadena, Sierra Madre, Arcadia, Monrovia, and Bradbury area, downed trees and resulted in extended power and utility outages. Based on previous windstorm history, it is not difficult to assume that a future windstorm event could generate similar damage. It is also possible that a strong Santa Ana wind condition could cause substantial damage in the City of Bradbury (EPC, 2019).

Who is Most Vulnerable?

Windstorms can affect the air quality of the general region. Strong winds can stir up dust, pollen, pollutants, and particulate matter. People with sensitive respiratory systems, or diseases such as asthma, can be put at greater risk for health complications due to strong wind events.

Windstorms damage buildings, power lines, and other property and infrastructure typically due to falling trees and branches. During wet winters, saturated soils cause trees to become less stable and more vulnerable to uprooting from high winds. When severe windstorms strike a city, downed trees, power lines, and damaged property can be major hindrances to emergency response and disaster recovery. Historically, falling trees are the major cause of power outages in the region. Windstorms such as strong microbursts and Santa Ana wind conditions cause flying debris and downed utility lines. Falling trees bring electric power lines down to the pavement, creating the possibility of lethal electric shock (EPC, 2019).

Structures with weak reinforcement, or structures that are older, are susceptible to damage from strong wind events. Wind pressure creates a direct and frontal assault on a structure, pushing walls, doors, and windows inward. Conversely, passing currents create lift suction forces that pull building components and surfaces outward. With extreme wind forces, the roof or entire building can fail causing considerable damage (EPC, 2019). Since approximately 65 percent of the existing housing stock in Bradbury was built prior to 1990, these units may be more susceptible to extreme wind conditions. Ensuring all new development, redevelopment, and retrofitting projects adhere to the most up to date State Building Codes and follow City development standards regarding slopes (Municipal Code Chapter 97, *Hillside Development Standards*), chances of hazardous impacts from windstorms decrease.

C. Key Findings

The key findings for Bradbury are summarized below to assist in increasing the City's adaptive capacity.

- Climate change has the potential to increase the severity of various natural hazards and impacts in the City of Bradbury.
- Wildland fires represent the threat most likely to affect Bradbury as a result of climate change. While most likely to ignite within the CAL FIRE FHSZs, the effects of wildfire can adversely impact larger areas, cascading out towards the entirety of Bradbury and the surrounding cities, with smoke, ash, and poor air quality.
- The most vulnerable populations are those living in or adjacent to Very High FHSZs within the City. Other vulnerable populations include seniors and people with pre-existing health conditions such as asthma.
- The most vulnerable natural areas are the sensitive hillside areas (and wildlife within these environments) located in the northern portion of the City, which are within the Very High Fire Hazard Severity Zone. This largely undeveloped area contains the most open space and natural landscape in the City and consists of high amounts of often dry foliage that is highly susceptible to fires. As prolonged dry spells are predicted to lengthen, plants, animals, and habitats that receive less and less water are more likely to burn from wildfire, leave the area, or die out from lack of resources.
- The most vulnerable infrastructure are power and energy infrastructure, as well as homes (and businesses) within and bordering the Very High FHSZs. Extreme weather and heat conditions can increase the risk of fires, which can lead to the destruction of energy infrastructure such as power lines that are located in more remote (and more fire prone) areas. Since energy grids are interconnected and provide energy throughout the region, large parts of the Southern California population are expected to be impacted by distant fires or power outages. Closely located infrastructure, i.e. neighborhood homes within and bordering FHSZs can suffer brutal impacts, and possibly even total destruction.
- Regional drought is also a key hazard to Bradbury as the City is served entirely by groundwater sources from the main San Gabriel Basin. Drought may also result in increased tree mortality, which contributes to higher fuel loading and wildfire size and severity. As expected with climate change, droughts are expected to increase both in frequency and intensity.

D. References

- Cal-Adapt (2022). *Local Climate Change Snapshot for Bradbury, California*. Accessed October 7, 2022. Available at <https://cal-adapt.org/tools/local-climate-change-snapshot/>
- California Department of Forestry and Fire Protection (CAL FIRE) (2022). *Fire Hazard Severity Zones Maps: Bradbury*. Accessed October 17, 2022. Available at <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>
- California Emergency Management Agency (2012a). *California Adaptation Planning Guide: Defining Local and Regional Impacts*.
- California Emergency Management Agency (2012b). *California Adaptation Planning Guide: Identifying Adaptation Strategies*.
- California Emergency Management Agency (2012c). *California Adaptation Planning Guide: Understanding Regional Characteristics*.
- California's Fourth Climate Change Assessment (2021). *California's Changing Climate 2018: A Summary of Key Findings from California's Fourth Climate Change Assessment*.
- California Health Insurance Survey (CHIS) (2022). *AskCHIS, Neighborhood Edition*. October 13, 2022.
- California Natural Resources Agency (2009). *2009 California Climate Adaptation Strategy*.
- City of Bradbury (2014). *City of Bradbury General Plan 2012-2030*. February 2014.
- Dudek (2022). *City of Bradbury Community Wildfire Protection Plan*. August 2022.
- Emergency Planning Consultants (EPC) (2019). *Hazard Mitigation Plan*. February 21, 2019.
- Hall, Alex, Neil Berg, Katharine Reich (University of California, Los Angeles) (2018). *Los Angeles Summary Report. California's Fourth Climate Change Assessment*. Publication number: SUM-CCCA4-2018-007.
- IPCC (2007). *Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [B. Metz, O.R. Davidson, P.R. Bosch, R. Dave, L.A. Meyer (eds)].
- Los Angeles County Chief Sustainability Office (LACCSO) (2021). *LA County Climate Vulnerability Assessment*. October 2021.
- Los Angeles County Public Works (2022). *National Flood Insurance Program and County Floodways*. Accessed October 17, 2022. Available at <https://pw.lacounty.gov/WMD/NFIP/>
- Los Angeles County Public Works, Environmental Programs Division (EPD) (2022). *Stormwater Home*. Accessed October 17, 2022. Available at <https://dpw.lacounty.gov/epd/Stormwater/>
- Pierce, D. W., J. F. Kalansky, and D. R. Cayan, (Scripps Institution of Oceanography) (2018). *Climate, Drought, and Sea Level Rise Scenarios for the Fourth California Climate Assessment. California's Fourth Climate Change Assessment, California Energy Commission*. Publication Number: CNRA-CEC-2018-006.

Southern California Association of Governments (SCAG) (2019). *Local Profiles Report: Profile of the City of Bradbury*. May 2019.

Tetra Tech (2021). *Los Angeles County Comprehensive Floodplain Management Plan*, July 2021.

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Appendix A: Regulatory Setting

State

California Air Resources Board

The California Air Resources Board is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA), which was adopted in 1988. The CCAA requires that all air districts in the state endeavor to achieve and maintain the California Ambient Air Quality Standards by the earliest practical date. The act specifies that districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

California Strategic Fire Plan

This statewide plan guides fire policy for much of California. The plan is aimed at reducing wildfire risk through pre-fire mitigation efforts tailored to local areas. The most recent update is the 2018 Strategic Fire Plan. The 2018 Plan reflects CAL FIRE's focus on: 1) fire prevention and suppression activities to protect lives, property, and ecosystem services; and 2) natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. There are also Unit Fire Plans produced under the Strategic Fire Plan that are localized to a county or region; the City of Bradbury falls under the Los Angeles County Fire Department Strategic Fire Plan.

State Water Resources Control Board/Regional Water Quality Control Board

In California, all wastewater treatment and disposal systems fall under the overall regulatory authority of the State Water Resources Control Board (SWRCB) and the nine California Regional Water Quality Control Boards (RWQCBs), who are charged with the responsibility of protecting beneficial uses of State waters from a variety of waste discharges, including wastewater from individual and municipal systems. The City of Bradbury falls within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Regional Board 4).

The RWQCBs' regulatory role often involves the formation and implementation of basic water protection policies. These are reflected in the RWQCBs' Basin Plans, generally in the form of guidelines, criteria, and prohibitions related to the siting, design, construction, and maintenance of on-site sewage disposal systems.

State Water Board Storm Water Strategy

The Storm Water Strategy is founded on the results of the Storm Water Strategic Initiative, which serves to direct the State Water Board's role in storm water resources management and involves the Storm Water Program by: a) developing guiding principles to serve as the foundation of the Storm Water Program; b) identifying issues that support or inhibit the program from aligning with the guiding principles; and c) proposing and prioritizing projects that the Water Board could implement to address those issues. The State Water Board staff created a document called the Strategy to Optimize Resource Management of Stormwater (STORMS). STORMS includes a program vision, mission, goals, objectives, projects,

timelines, and consideration of the most effective integration of project outcomes into the Water Board's Storm Water Program.

Urban Water Management Planning Act

The Urban Water Management Planning Act's main objectives are the management of urban water demands and the efficient use of urban water. Under its provisions, every urban water supplier is required to prepare and adopt an urban water management plan. The plan must identify and quantify the existing and planned sources of water available to the supplier, quantify the projected water use for a period of 20 years, and describe the supplier's water demand management measures.

California Department of Public Health

The Department of Public Health contains the Division of Radiation Safety and Environmental Management (DRSEM), which is divided into three branches: the Radiologic Health Branch, the Environmental Health Branch, and the Drinking Water and Radiation Laboratory Branch. The Radiologic Health Branch enforces the laws and regulations designed to protect the public, radiation workers, and the environment. The Environmental Management Branch regulates the medical waste industry and recreational health (public swimming pools, ocean beaches, and organized camps); provides sanitary surveillance of state institutions; administers the Registered Environmental Health Specialist (REHS) program; oversees radiological cleanup at military base closure facilities; and coordinates the State's Indoor Radon Program, the Medical Waste Management Program, and California Department of Public Health's Nuclear Emergency Response Program. The Drinking Water and Radiation Laboratory Branch is the State's primary drinking water quality testing laboratory and is the state laboratory capable of measuring chemical, microbiological, and radiochemical contaminants in drinking water and drinking water supplies.

California Water Code

California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act of 1970 (Division 7 of the California Water Code). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and each of the Regional Water Quality Control Boards (RWQCBs) power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the Federal Clean Water Act. The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

Each RWQCB must formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The regional plans conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

California Building Code

The California Building Standards Code (CBSC) (California Code of Regulations, Title 24) is a statewide standard that is updated every three years, with the most recent update being in 2019. The CBSC is a compilation of three types of building standards from three different origins:

- Building standards that were adopted by state agencies without change from national model building codes;
- Building standards that were adopted from national model codes but modified to address California specific conditions;
- Building standards, authorized by the California legislature, that constitute amendments not covered by national model codes, that were created to address particular California concerns.

The CBSC specifies materials requirements, construction methods, and maintenance standards for earthquake protection and resiliency. All building occupancies in California are subject to national model codes adopted into the CBSC, and occupancies are further subject to amendments adopted by state agencies. State law also authorizes local governments to enact ordinances making building standards amendments to the CBSC to address local conditions. The law includes specific requirements for the basis for a local amendment, how the amendment language and documents must be prepared, and how the amendment must be filed with either the CBSC, the California Department of Housing and Community Development, or other state agencies as required. The City of Bradbury adopted the 2019 CBSC into the City Municipal Code under Section 17.01.010, *Adoption of Building Code*, of Title 17, *Building Regulations*.

California Fire Code

The California Fire Code, as a part of Title 24, California Code of Regulations, establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California. The City of Bradbury has adopted the California Fire Code into Title 4, *Public Safety*, Chapter 3, *Fire Code*, of the Municipal Code.

Wildfire Protection Responsibility in California

Local, state, tribal, and federal organizations all have legal and financial responsibility for wildfire protection. In many instances, two fire organizations have dual primary responsibility on the same parcel of land – one for wildfire protection and the other for structural fire protection. To address wildfire jurisdiction responsibilities, in 1981 the California State Legislature outlined various wildfire responsibilities, described below, in Cal. Pub. Res. Code § 4291.5 and Cal. Health & Safety Code § 13108.5.

Federal Responsibility Areas (FRAs)

FRAs are fire-prone wildland areas that are owned or managed by a federal agency such as the U.S. Forest Service, National Park Service, Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S.

Department of Defense. Primary financial and rule-making jurisdiction authority rests with the federal land agency. In many instances, FRAs are interspersed with private land ownership or leases. Fire protection for developed private property is usually the responsibility of the relevant local government agency, not the federal land management agency.

State Responsibility Areas (SRAs)

SRAs are lands in California where the California Department of Forestry and Fire Protection (CAL FIRE) has legal and financial responsibility for wildfire protection. CAL FIRE administers fire hazard classifications and establishes development and building standard regulations in these areas. SRAs are defined as lands that:

- Are in the unincorporated county areas
- Are not federally owned
- Have wildland vegetation cover rather than agricultural or ornamental plants
- Have row crops or seasonal crops, or
- Have watershed, range, or forage values

CAL FIRE adopts SRA boundaries and updates them every five years. Where SRAs contain structures or development, the relevant local government agencies have fire protection responsibility for those improvements.

Local Responsibility Areas (LRAs)

LRAs include land in cities, cultivated agriculture lands, unincorporated non-flammable areas, and lands that do not meet the criteria for SRA or FRA. LRA fire protection is typically provided by city or county fire departments, fire protection districts, or by CAL FIRE under contract to local governments. LRAs may include areas of flammable vegetation and WUI.

The City of Bradbury's VHFHSZ is a Local Agency VHFHSZ, as defined, and the City is considered an LRA. The LACoFD is the responsible agency for fire protection within the City's VHFHSZ. The City abuts lands where the responsibility for fire protection lies with the Federal or State of California (FRA or SRA). The City released a Community Wildfire Protection Plan in August of 2022.

Alquist-Priolo Earthquake Fault Zoning Act and Seismic Hazards Mapping Act (1972)

The 1971 San Fernando Earthquake resulted in the destruction of numerous structures built along its fault. This led to passage of the Alquist-Priolo Earthquake Fault Zoning Act in 1972. This Act prohibits the construction of buildings for human occupancy across active faults in the state. Similarly, extensive damage caused by ground failure during the 1989 Loma Prieta Earthquake focuses attention on decreasing the impacts of landslides and liquefaction. This led to the creation of the Seismic Hazards Mapping Act (1990), which enhances construction standards at locations where ground failures are probable during earthquakes.

Senate Bill 610 and Assembly Bill 901 (2001)

SB 610 and AB 901 both modify the Urban Water Management Planning Act. SB 610 requires additional information in an urban water management plan if groundwater is identified as a water source supplier.

It also requires that the plan include a description of all water supply projects and programs that may be undertaken to meet total projected water use. SB 610 also requires a city or county that determines a project is subject to CEQA to identify any public water system that may supply water to the project and to request identified public water systems to prepare a specified water supply assessment. The assessment must include, among other information, an identification of existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and water received in prior years pursuant to these entitlements, rights, and contracts.

AB 901 requires an urban water management plan to include information, to the extent practicable, relating to the quality of existing sources of water available to an urban water supplier over a given period of time. AB 901 also requires information on how water quality affects water management strategies and supply reliability. The bill requires plans to supplement a water source that may not be available at a consistent level of use, to the extent practicable. Additional findings and declarations relating to water quality are required.

California Oak Woodland Conservation Act (2001)

The California Legislature passed Assembly Bill 242, known as the California Oak Woodland Conservation Act, in 2001 as a result of widespread changes in land use patterns across the landscape that were fragmenting oak woodland character over extensive areas. The Act created the California Oak Woodland Conservation Program within the Wildlife Conservation Board. The legislation provides funding and incentives to ensure the future viability of California's oak woodland resources by maintaining large scale land holdings or smaller multiple holdings that are not divided into fragmented, nonfunctioning biological units. The Act acknowledged that the conservation of oak woodlands enhances the natural scenic beauty for residents and visitors, increases real property values, promotes ecological balance, provides habitat for over 300 wildlife species, moderates temperature extremes, reduces soil erosion, sustains water quality, and aids with nutrient cycling, all of which affect and improve the health, safety, and general welfare of the residents of the state.

Assembly Bill 1007 (2005)

Assembly Bill 1007 (Pavley, Chapter 371, Statutes of 2005) directs the California Energy Commission (CEC) to prepare a plan to increase the use of alternative fuels in California. As a result, the CEC prepares the State Alternative Fuels Plan in consultation with state, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The plan assesses various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Executive Order S-3-05 (2005)

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05. The goal of this Executive Order is to reduce California's GHG emissions to: 1) 2000 levels by 2010, 2) 1990 levels by 2020, and 3) 80% below 1990 levels by 2050. While two of the benchmark years have passed, the City of

Bradbury, along with the rest of the state, can still aim to reduce GHG emissions 80% below the 1990 levels by the year 2050.

Assembly Bill 32 and Executive Order S-20-06 (2006)

In 2006, California adopted Assembly Bill (AB) 32, the Global Warming Solutions Act, as an effort to address the effects of climate change and help reach the goals presented in Executive Order S-3-05. AB 32 sets the same overall GHG emissions reduction goals while further mandating that CARB create a plan, which includes market mechanisms, and implement rules to achieve “real, quantifiable, cost-effective reductions of greenhouse gases.”

Executive Order S-20-06 further directs State agencies to begin implementing AB 32, including the recommendations made by the State’s Climate Action Team.

Bioenergy Action Plan – Executive Order S-06-06 (2006)

Executive Order S-06-06 establishes targets for the use and production of biofuels and biopower. The order also directs State agencies to work together to advance biomass programs while providing environmental protection and mitigation. The executive order establishes targets to increase production and use of ethanol and biodiesel fuels by a minimum of 20% by 2010, 40% by 2020, and 75% by 2050. Additionally, the executive order sets targets for the state related to the use of biomass electricity and cogeneration facilities.

Senate Bill 375 (2008)

California’s Sustainable Communities and Climate Protection Act of 2008 (SB 375) requires transportation agencies to develop a regional “Sustainable Communities Strategy” of land use, housing, and transportation policies that will move the region towards meeting the GHG reduction target set by the CARB. On September 3, 2020, the Southern California Association of Governments (SCAG), the metropolitan planning organization responsible for Bradbury and surrounding regions, adopted Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy), which sets forth a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals.

Assembly Bill 162 (2009)

This bill requires, upon the next revision of the housing element, on or after January 1, 2009, the Conservation Element of the General Plan to identify rivers, creeks, streams, flood corridors, riparian habitat, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management. By imposing new duties on local public officials, the bill creates a state-mandated local program.

This bill also requires, upon the next revision of the housing element, on or after January 1, 2009, the safety element to identify, among other things, information regarding flood hazards and to establish a set of comprehensive goals, policies, and objectives, based on specified information for the protection of the community from, among other things, the unreasonable risks of flooding.

Assembly Bill 341 California's Mandatory Commercial Recycling Law (2012)

The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California.

California Sustainable Groundwater Management Act (2014)

On September 16, 2014, Governor Brown signed into law a package of bills (SB 1168, AB 1739, and SB 1319) collectively called the Sustainable Groundwater Management Act. The Act requires local governments and water agencies with high and medium priority groundwater basins to halt overdraft and bring basins into sustainable levels of pumping and recharge. For each basin, local agencies are required to form new groundwater sustainability agencies and prepare groundwater sustainability plans with quantifiable objectives for achievement of sustainability within 20 years.

Senate Bill 379 (2015)

SB 379 revises Government Code Section 65302(g)(4) to require cities and counties to update their safety elements to address climate adaptation and resiliency strategies applicable to their jurisdiction. The updates are required at the next update of their local hazard mitigation plan (LHMP) on or after January 1, 2017. Local jurisdictions without an LHMP must update their safety elements beginning on or before January 1, 2022. The safety element update must include:

- A vulnerability assessment identifying the risks that climate change poses to the local jurisdiction
- A set of goals, policies, and objectives based on a vulnerability assessment for the protection of the community
- A set of feasible implementation strategies to carry out the goals, policies, and objectives

Statewide Emergency Water Conservation Regulations (2016)

In 2016, the State Water Resources Control Board (SWRCB) adjusted emergency water conservation regulations in recognition of the differing water supply conditions and ongoing drought across the state to comply with the Governor's executive order declaring a drought emergency.

Executive Order B-37-16, Making Water Conservation a California Way of Life, updates temporary emergency water restrictions and transitions to permanent, long-term improvements in water use by:

- Providing for wiser water use
- Eliminating water waste
- Strengthening local drought resilience
- Improving agricultural water use efficiency and drought planning

In April 2017, a new Executive Order lifted the drought emergency, but retained many of the conservation requirements. Most regulations are still in effect except for water supply "stress test" requirements and conservation standards for urban water suppliers. The temporary restrictions established a baseline of the types of benefits that are possible from water conservation requirements.

Senate Bill 1383 (2016)

In September 2016, Governor Brown signed SB 1383, Short-Lived Climate Pollutants: Organic Waste Methane Emissions Reductions, establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of California's economy. The bill codifies the CARB's SLCP Reduction Strategy, established pursuant to SB 605 (2014), in order to achieve reductions in the statewide emissions of short-lived climate pollutants. Actions to reduce short-lived climate pollutants are essential to address the many impacts of climate change on human health, especially in California's most at-risk communities, and on the environment.

California State Hazard Mitigation Plan (2018)

The 2018 California State Hazard Mitigation Plan is the State's primary hazard mitigation guidance document. It seeks to help communities with their mitigation and disaster resiliency efforts to reduce or eliminate potential risks and impacts of natural and human-caused disasters. The 2018 plan was approved by the Federal Emergency Management Agency (FEMA) on September 28, 2018, and includes:

- An updated statewide risk assessment, disaster history, and statistics
- Recent mitigation progress, success stories, and best practices
- Updated State hazard mitigation goals, objectives, and strategies
- Updated climate mitigation progress and adaptation strategies

California Water Plan (2018)

The California Water Plan is the State's strategic plan for sustainably managing and developing water resources for current and future generations. Required by Water Code Section 10005(a), it presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The plan is updated every five years, with the most recent update occurring in 2018.

Local

City of Bradbury General Plan 2012-2030

A variety of goals, policies, and actions contained in the existing City of Bradbury General Plan address climate change vulnerabilities. Specific goals, policies, and implementation actions found within the General Plan that are most related to climate change include:

Land Use Element

- **Goal 2:** Preserve the identity, image and environmental quality of the hillside and open space areas in perpetuity by enforcing the Hillside Development Standards.
 - **Objective 1:** To maintain the existing character of the community and to preserve those environmental resources and amenities that make the City of Bradbury a desirable place to live.
 - **Policy 1:** The residential character of the community and environmental resources important to the City will be maintained.

- **Action 1:** Encourage as much hillside preservation as possible through the use of conservation easements, acquisition efforts by conservation organizations or preservation as natural preserves that promote the protection of natural hillsides as open-space in perpetuity.
- **Action 3:** Revise the City's Design Guidelines to promote sustainable building and development design alternatives.

Community Resources Element – Open Space

- **Goal 1:** Protect and enhance Bradbury's Open-Space.
 - **Objective 1:** Make open-space resources available to existing and future residents.
 - **Objective 2:** Make open-space resources accessible without the need to use motorized transportation.
 - **Policy 1:** Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration.
 - **Policy 2:** Protect water quality.
 - **Policy 3:** Mandatory replacement planting of native trees and oaks.
 - **Policy 4:** Protect existing Blueline Streams.
 - **Policy 5:** Prevention of soil erosion.
 - **Policy 6:** Preservation of historically or culturally significant sites.
 - **Policy 7:** Protect wildlife and their habitats, including rare and endangered species.
 - **Policy 8:** Protection of rare and endangered plants.
 - **Policy 9:** Promote development and management of public and private parks, trails and recreational areas.
 - **Action 1:** Protect water quality.
 - **Action 2:** Avoid drainage run-off where possible.
 - **Action 3:** Promote landscaping efforts that comply with State water efficient standards, fire department standards, and protection of plant and wildlife communities.
 - **Action 4:** Prevent soil erosion.
 - **Action 6:** Promote public acquisition of open-space land by non-profit land trusts or conservation organizations.
 - **Action 7:** Use Specific Plans to set aside open-space areas as part of development proposals.
 - **Action 8:** Explore the use of transferring development rights to create and preserve open-space.
 - **Action 9:** Explore grant financing opportunities to acquire and development pedestrian and equestrian trails.

Community Resources Element – Conservation

- **Goal 1:** Maintain a healthy and clean city.
- **Goal 3:** Protect the valuable watershed and natural habitat areas.
- **Goal 4:** Protect and maintain the local water supply to ensure that the City's growing demand for water is properly accommodated.

- **Goal 5:** Protect Bradbury’s environment through the use of renewable energy resources.
- **Goal 7:** Regulate future surface streets to minimize impacting natural open-space areas.
- **Goal 8:** Ensure that development in the steep foothill area is sensitive to the local environment.
- **Goal 9:** Maintain Land Use policies that have minimal impact on existing air quality.
- **Goal 10:** Maximize efforts to reduce air pollution from mobile sources.
- **Goal 11:** Strive to achieve ambient levels of particulate matter to meet State and Federal clean air standards.
 - **Objective 2:** Provide adequate waste disposal systems and increase the use of compatible renewable energy resources.
 - **Objective 5:** Continue to develop a comprehensive NPDES plan that meets State standards.
 - **Policy 1:** Protect water bodies, watersheds and courses from development impacts.
 - **Policy 3:** Protect surface water resources from contamination.
 - **Policy 5:** Conserve water supplies (ground and surface).
 - **Policy 6:** Conserve riparian vegetation.
 - **Policy 7:** Conserve wildlife habitat and assist residents in living with wildlife.
 - **Policy 8:** Conserve oak woodlands
 - **Policy 10:** Control and prevent erosion.
 - **Policy 11:** Enforce preservation landscape design programs.
 - **Policy 12:** Protect sensitive plant species and their habitats.
 - **Policy 13:** Protect rare, threatened, or endangered species.
 - **Policy 14:** Explore the use of Habitat Conservation Plans and Natural Communities Conservation Programs.
 - **Policy 15:** Eliminate identified water pollution sources.
 - **Policy 16:** Improve major sewer, water, and storm drainage systems.
 - **Policy 17:** Control hazardous materials in areas where water pollution is possible.
 - **Policy 18:** Implement and maintain flood management facilities.
 - **Policy 19:** Protect natural resources
 - **Policy 20:** Protect and improve air quality through coordinated efforts with other public agencies and jurisdictions.
 - **Action 6:** Promote green waste and recycling programs such as “green and clean” which increases the usage of green waste for compost and reduces the amount of green waste exported.
 - **Action 10:** Create and maintain renewable energy guidelines for residents.
 - **Action 11:** Plan and schedule implementation for additional TMDLs.
 - **Action 12:** Plan for measures to control pollutants in surface runoff.
 - **Action 13:** Develop public education and outreach programs with regard to surface runoff, catch basin and storm drainage system maintenance.
 - **Action 14:** Implement procedures to detect and eliminate illegal discharges and illicit disposal practices.
 - **Action 17:** Provide community residents with information as to how to peacefully coexist with the natural wildlife inhabiting the area.

Health and Safety Element – Safety

- **Safety Goal 1:** To protect the citizens, their property and public facilities from natural and manmade hazards.
- **Safety Goal 2:** To establish, maintain, and develop awareness on the part of all residents of Bradbury as to how to react and protect themselves and each other, in the event of a natural or manmade hazard or disaster.
- **Safety Goal 4:** To minimize the risk to persons and property due to seismic activity.
- **Safety Goal 5:** To minimize the risk to lives and property due to fire hazards.
- **Safety Goal 7:** Protect the community from flood and landslides.
- **Safety Goal 8:** Assure that existing and new development addresses fire protection in a proactive and preventative way.
 - **Safety Objective 1:** Prepare the community for expected or unexpected disasters resulting from natural or manmade causes.
 - **Safety Objective 3:** Communicate with Bradbury residents through all available media that safety personnel are properly trained to provide assistance in the event of a disaster.
 - **Safety Objective 4:** Implement the City’s Hazard Mitigation Plan in a timely manner.
 - **Safety Objective 6:** Assure that potential flooding and landslide hazards are reviewed during new development.
 - **Safety Objective 7:** Ensure that adequate service levels of fire protection are maintained in the City.
 - **Safety Policy 2:** Implement precautionary measures in high risk areas to reduce injury and loss of property caused by natural or manmade hazards.
 - **Safety Policy 4:** Provide adequate levels of service to ensure that the residents are protected to the best of the City’s ability from natural and manmade disasters.
 - **Safety Policy 5:** Cooperate with Federal, State, and County agencies responsible for the enforcement of all health and safety laws and regulations.
 - **Safety Policy 9:** Support continuing review and updating of the City’s Disaster Preparedness Program manual.
 - **Safety Policy 11:** Maintain and evaluate the level of safety services available to the community.
 - **Safety Policy 13:** Continue to support “mutual assistance” agreements between local and State fire fighting agencies.
 - **Safety Policy 14:** Continue to support programs to reduce fire hazards within the community.
 - **Safety Policy 20:** Require that all new development incorporate sufficient measures to mitigate flood and landslide hazards including but not limited to on-site drainage systems and grading of site to minimize stormwater runoff.
 - **Safety Action 4:** Update the hillside development standards which include fire prevention design measures.
 - **Safety Action 5:** Continue to make emergency and disaster preparedness a community priority.
 - **Safety Action 6:** Update and review the Emergency Operation Plan annually.

- **Safety Action 7:** City staff to continue to work with the LACFD on brush removal and weed abatement from April to June.
- **Safety Action 10:** Maintain and update the multi-hazard emergency plan for the City.
- **Safety Action 11:** Continue support and participation with the Emergency Response Committee.

Climate Action Plan

The Climate Action Plan is incorporated into the existing General Plan. The relevant goals, policies, and actions of the Climate Action Plan are:

- **Goal 1:** Preserve the energy efficiency of existing housing units within the community.
- **Goal 2:** Move toward net zero energy development to minimize additional energy demand within the community.
- **Goal 3:** Integrate innovative and cost effective water conservation efforts into new and existing development to conserve energy used to pump, treat, and convey water.
- **Goal 4:** Optimize shading and cooling to reduce community-wide energy demand.
- **Goal 5:** Conserve energy and limited fiscal resources through energy efficiency and conservation improvements at the Civic Center.
 - **Objective 1:** Reduce dependence on nonrenewable energy resources.
 - **Objective 2:** Reduce energy consumption by City owned facilities and equipment.
 - **Objective 3:** Reduce energy consumption by all residential dwellings.
 - **Policy 1:** Annually monitor and report the City's progress toward achieving the reduction target.
 - **Policy 2:** Regularly review and update the City's Greenhouse Gas (GHG) inventory, energy profile and Energy Action Plan.
 - **Policy 3:** Continue to develop collaborative partnerships that support implementation of the Energy Action Plan.
 - **Policy 4:** Support regional funding efforts to implement the Energy Action Plan.
 - **Policy 5:** Promote the reduction of dependency on motor vehicles by encouraging the use of alternate transportation modes.
 - **Action 1:** Recognize homeowners that have implemented cost effective energy efficiency improvements.
 - **Action 2:** Encourage homeowner associations to support community energy efficiency efforts such as an annual neighborhood energy conservation competition.
 - **Action 3:** Provide a residential energy efficiency checklist that prioritizes actions by return on investment to interested homeowners.
 - **Action 4:** Provide incentives to encourage various homeowners to participate in an energy audit that can be used as a case study for others.
 - **Action 5:** Encourage homeowners to participate in utility funded energy efficiency programs and retrofits such as Energy Upgrade California.
 - **Action 6:** Provide new construction owners with educational materials and resources that assist with energy efficiency improvements.

- **Action 7:** Create and enforce outdoor lighting efficiency standards.
- **Action 8:** Explore group purchase programs to reduce the cost of purchasing energy-efficient appliances, lighting, or pool equipment.
- **Action 9:** Encourage the use of smart grid-integrated appliances to allow for programming to operate appliances remotely or when energy costs are at their lowest.
- **Action 10:** Encourage the use of variable speed drive pumps for pools and spas.
- **Action 11:** Work with adjacent and regional governmental entities to pursue funding for residential audits and retrofits.
- **Action 12:** Pursue grants or other financial sources to fund showcase home energy retrofits.
- **Action 13:** Consider including the policies of the model energy efficiency code and checklist, prepared by the San Gabriel Valley Council of Governments, into the City's zone code and design guidelines where feasible.
- **Action 14:** Utilize improvement to City facilities such as landscaping to demonstrate the effective use of appropriate water-efficient vegetation.
- **Action 15:** Encourage the water purveyor to provide water efficiency kits or other resources to City residents.
- **Action 16:** Encourage the use of recirculating water systems for decorative water features.
- **Action 17:** Promote the retention of natural vegetation and the rural character of the community.
- **Action 18:** Promote the use of cool roofs, light-colored paved surfaces, and permeable pavement in new and existing residential projects.
- **Action 19:** Conduct an audit of City facilities every five years to assure peak energy performance and identify new technologies or appliances to be installed as they become cost-effective.
- **Action 20:** Participate in the San Gabriel Valley Council of Government's utility manager program, the Enterprise Energy Management Information System, to regularly track energy use and identify cost-saving opportunities through sub-metering and energy management.

City of Bradbury Municipal Code

Title IV of the Municipal Code is dedicated to Public Safety. Chapter 3, *Fire Code*, within this Title includes the adoption of the most recent (2019) California Fire Code (Section 4.03.010, *Adoption of Fire Code*), violation infractions, and responsibilities of specific parties. Title IV also contains Chapter 4, *Emergency Preparedness*; the purposes of this chapter are to provide for the preparation and carrying out of plans within the City in the event of an emergency; the direction of the emergency organization; and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations, and affected private persons. Further, Chapter 5, *Floodplain Management*, is included in this Title as well. Chapter 5 discusses development regulations and procedures when potential flood

hazards are present; Article III, *Provisions for Flood Hazard Reduction*, establishes standards for construction and proposed new development.

Title IX, *Development Code*, discusses all aspects of development, from administrative organization to development code definitions, to development permit procedures, to site planning. The purpose of the regulations contained in this Title is to classify, designate, regulate, and restrict the use of buildings, land, and structures, in order to permit the optimum use of land within the City; to serve the needs of residential, agricultural, water conservation, and other purposes within the City; to regulate and limit the height, number of stories, size, and location of buildings and other structures, hereafter designed, erected, or altered; to regulate the size of yards and open spaces; to regulate and limit the density of population; to facilitate adequate provisions for community utilities and facilities, such as transportation, water, sewage, schools, parks, and other public requirements; to lessen congestion on streets; and to promote the public health, safety, welfare, and general prosperity with the aim of preserving a wholesome, serviceable, and attractive community.

Title XV, *Street and Public Works*, contains Chapter 3, *Stormwater and Urban Runoff Pollution Prevention Measures*, and Chapter 4, *Stormwater and Urban Runoff Pollution Control*. The purpose of Chapter 3, *Stormwater and Urban Runoff Pollution Prevention Measures*, is to protect the health, safety, and general welfare of the citizens of the City by:

- (1) Regulating the discharge of non-stormwater fluids into the municipal stormwater drainage system;
- (2) Providing for the control of spillage, dumping, or disposal of contaminants, chemicals, or materials into the municipal stormwater drainage system; and
- (3) Reducing pollutants in stormwater and urban runoff to the maximum extent practicable.

This Chapter regulates illicit discharge, illicit disposal, construction sites that require a building permit, penalties warranted for failing to comply with the Chapter, and fees.

The purpose of Chapter 4, *Stormwater and Urban Runoff Pollution Control*, is to ensure the future health, safety, and general welfare of the citizens of the City and the water quality of the receiving water of the County and surrounding coastal areas. The objective of Section 15.04.120, *Stormwater pollution control measures for development planning and construction activities*, is to establish requirements for construction activities and facility operations of development and redevelopment projects to comply with the current municipal NPDES permit, lessen the water quality impacts of development by using smart growth practices, and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. LID shall be inclusive of SUSMP requirements. Section 15.04.130, *Stormwater pollution control requirements*, states that the site for every planning priority project shall be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use.

Title XVII, *Building Regulations*, contains the adoption of numerous state codes: Chapter 1, *Building Code*; Chapter 2, *Mechanical Code*; Chapter 3, *Plumbing Code*; Chapter 4, *Electrical Code*; Chapter 7, *Underground Utility Facilities*; Chapter 8, *Water Service Requirements*; Chapter 9, *Green Building*

Standards Code; Chapter 10, *Water Conservation/Water of Water*. Each code helps ensure safety, security, and reliability with regard to the operation of its respective field.

City of Bradbury Community Wildfire Protection Plan (2022)

The Bradbury CWPP was developed for the City with input and direction from stakeholders and the community. The purpose of this collaboratively prepared CWPP is to serve as a fire protection planning document that presents the City's physical characteristics, wildfire hazard, assets at risk from wildfire, vegetation/fuel management projects and specifications, and goals and action items intended to reduce wildfire risk in the City.

Development of the Bradbury CWPP included an assessment of wildfire hazard, which involved modeling potential fire behavior around the City under extreme wind and weather conditions, consistent with conditions experienced during a Santa Ana wind event. Other wildfire hazard variables were evaluated (terrain, weather, fuels, development patterns, fire department response, structure density, etc.) to identify the Very High Fire Hazard Areas adjacent to the City.

The CWPP outlines a series of policies and action items which are intended to guide implementation of the CWPP. The policies and actions focus on codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Action items identify tasks to be implemented by the City and the LACoFD, and other responsible City Departments, to achieve the stated goal of protecting lives, property, and natural resources threatened by wildland fire.

City of Bradbury Local Hazard Mitigation Plan (2019)

The Local Hazard Mitigation Plan (LHMP) provides a framework for planning for natural hazards. The resources and background information in the plan are applicable City-wide and to City-owned facilities outside of the City boundaries, and the goals and recommendations provide groundwork for local mitigation plans and partnerships. The LHMP is divided into four parts: Planning Process, Risk Assessment, Mitigation Strategies, and Appendix.

The LHMP was prepared in response to the Disaster Mitigation Act of 2000 (DMA 2000). DMA 2000 (also known as Public Law 106-390) requires state and local governments to prepare mitigation plans to document their mitigation planning process, and identify hazards, potential losses, mitigation needs, goals, and strategies. This type of planning supplements the City's comprehensive land use planning and emergency management planning programs. The document is a federally mandated update to the City of Bradbury 2007 Natural Hazard Mitigation Plan and ensures continuing eligibility for Hazard Mitigation Grant Program (HMGP) funding.

Los Angeles County Operational Area Emergency Response Plan (2012)

The Los Angeles County Operational Area Emergency Response Plan (OAERP) provides guidance and procedures for the County and the County as the Operational Area (OA) to prepare for and respond to natural, technological, conflict-related, and human-caused incidents creating situations requiring a coordinated response. It provides guidance for management concepts, identifies organizational structures and relationships, and describes responsibilities and functions of the emergency organization to protect life and property. The plan describes the emergency organization and the process of preparing, responding to, and recovering from disasters.

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EXHIBIT “C”

City of Bradbury

SB 99 Analysis White Paper Residential Emergency Evacuation Route Analysis

Prepared by De Novo Planning Group
May 2023



City of Bradbury SB 99 Analysis White Paper

In coordination with its Health and Safety Element Update (2023), the City of Bradbury has prepared an analysis consistent with Senate Bill 99 to identify residential developments in high hazard zones that do not have at least two emergency evacuation routes. The analysis identified one (1) residential area of concern in the high hazard zone that warrants further study, and that is located on the eastern side of the City. The following is an explanation of the methodology used to map the evacuation routes.

DEFINITIONS & DATA SOURCES

HAZARD AREAS

High Hazard Zones are defined as areas that are located in one or more of the following pre-defined hazard zones:

1. FEMA's 100-year flood zone (NOT PRESENT)
2. California OES dam inundation area (PRESENT)
3. California Geological Survey's Map Sheet 58 Landslide Susceptibility classes 8, 9, or 10 (PRESENT)
4. California Geological Survey's Potential Liquefaction areas, mapped as part of the California Seismic Hazard Zonation Program (PRESENT)
5. California Geological Survey's Potential Landslide areas, mapped as part of the California Seismic Hazard Zonation Program (PRESENT)
6. California Geological Survey's Alquist-Priolo Fault Hazard Zones (PRESENT)
7. CAL FIRE's Very High Fire Hazard Severity Zones in Local Responsibility Areas (PRESENT)

These high hazard zones were combined into one single "Combined Hazard Area" using ArcGIS union geoprocessing tools.

RESIDENTIAL DEVELOPMENTS

Parcel data were obtained from the County of Los Angeles Enterprise Geographic Information Systems. This parcel set includes Land Use Classifications based on the City's General Plan land use designations (2014). Parcels with the "Residential" designation were considered residential developments for the purposes of this study.

ACCESS TO MAJOR ARTERIALS

The CAMS database from Los Angeles County was used to identify points of exit from clusters (neighborhoods) of residential parcels. Road centerlines were divided into three main classes:

1. **Freeway or Highway**
2. **Arterial Road** – These roads are noted as Primary and Secondary Roads in the CAMS database.
3. **Minor Road** – These roads are generally the first roads a resident will encounter when departing their residence.

ASSUMPTIONS & METHODOLOGY

IDENTIFICATION OF RESIDENTIAL DEVELOPMENTS IN HAZARD AREAS

Using ArcGIS, Residential Developments in Hazard Areas were identified by running a location query to find the parcels with Residential General Plan designations that intersect the single Combined Hazard Area.

IDENTIFICATION OF RESIDENTIAL SUBDIVISION EXIT POINTS

The goal of this analysis was to find at least two separate points of exit from residential areas in hazard zones by following a rudimentary roadway network in which vehicles move from Minor Roads to Arterial Roads, and eventually to a Freeway or Highway. The following assumptions apply:

1. Residential Developments have immediate access to Minor/Residential Roads but are distant from Freeways.
2. Arterials connect Minor/Residential Roads to the Freeways.
3. Residential Exit Points are the points where Minor/Residential Roads intersect Arterials, thereby providing eventual access to a Freeway.

ANALYSIS & RESULTS

ANALYSIS

Upon visual analysis, residential parcels within the Combined Hazard Area were assigned to one of two categories:

1. One Exit Point with Access to Single Arterial
2. Multiple Exit Points with Access to Multiple Arterials

RESULTS

A total of 402 unique land parcels were identified as Residential AND within the Combined Hazard Area. Of these:

1. 262 parcels in the western portion of the City have multiple exit points with access to multiple arterials (GREEN ON THE MAP).
2. 140 parcels in the eastern portion of the City have one exit point with access directly onto a single arterial (RED ON THE MAP).

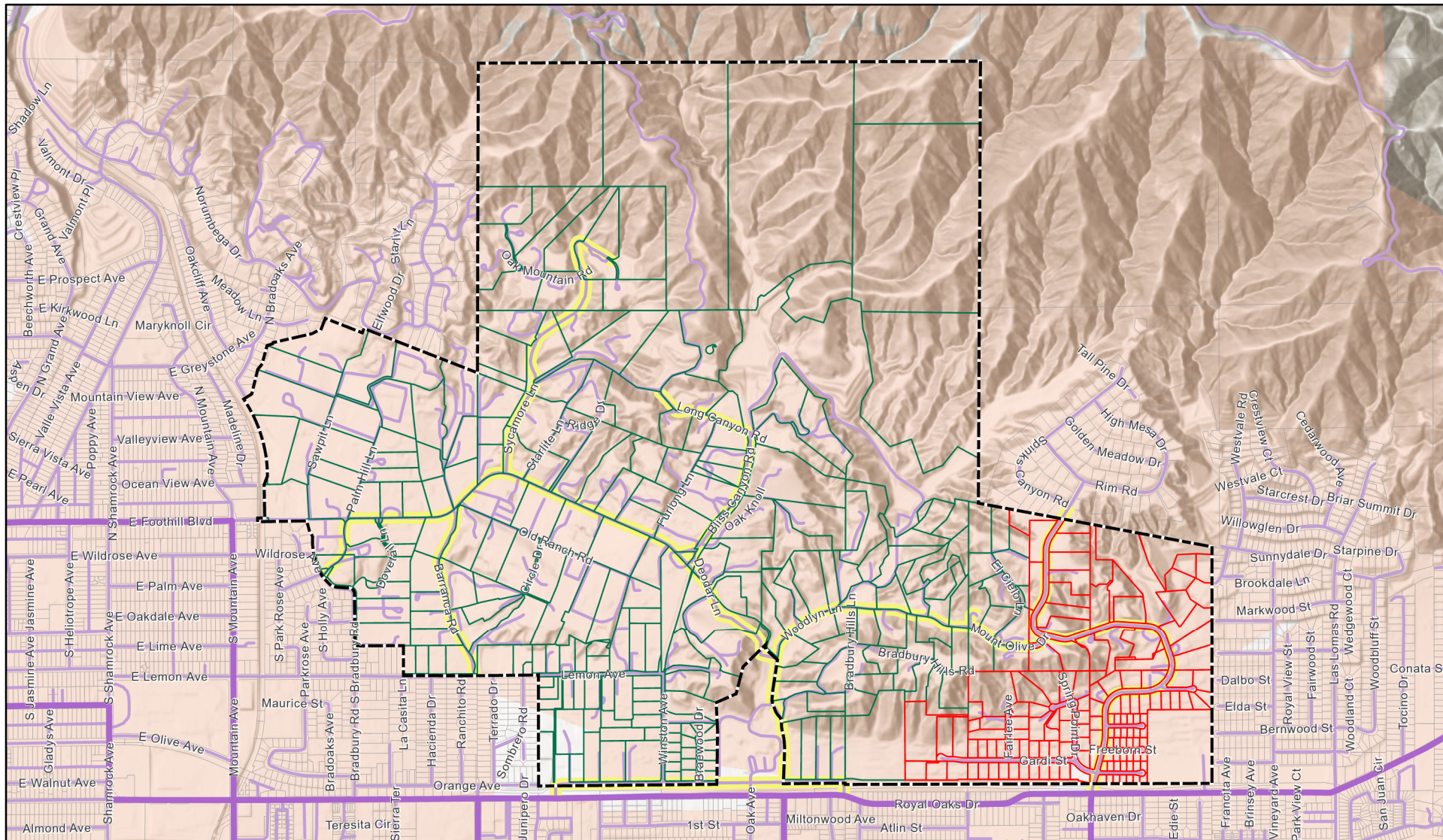
CONCLUSION

The following neighborhoods should be reviewed for adequate exit strategies:

- Mount Olive Drive provides north-south access to the City of Bradbury in the eastern portion of the City. It provides the single point of access for many Bradbury residents, as well as residents living in the neighboring Duarte Mesa. A total of 140 single-family residential parcels in Bradbury and an undetermined number of single-family residential parcels in the Duarte Mesa must all exit the area via Mount Olive Drive, which is classified as a Collector Street in the City's General Plan Circulation-Transportation Element and as Minor/Residential Road in the Los Angeles County

CAMS database. Mount Olive Drive exits onto Royal Oaks Drive, which is classified as an Arterial Road. Although a potential secondary point of access exists via Woodlyn Lane, this street is gated and identified only as a “First Responders Ingress Route” in the Circulation-Transportation Element. Woodlyn Lane is not considered a through street from Mount Olive Drive.

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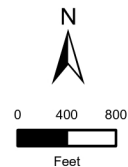


LEGEND

- Combined Hazard Area
- Bradbury City Limits
- Freeway or Highway*
- Arterial Road
- Minor Road
- City of Bradbury Primary Evacuation Routes

Residential Parcels In Hazard Areas

- One Exit Point with Access to Single Arterial
- Multiple Exit Points with Access to Multiple Arterials



CITY OF BRADBURY

Access to Arterials from Residential Areas in High Hazard Zones

* There are no freeways or highways within the mapped extent.
Sources: CGS, CalFire, FEMA, Los Angeles County GIS. Map date: May 30, 2023.



Darlene Kuba, Chairperson (District 3)
Frank Hernandez, Vice Chairperson (District 1)
Chelsea Halbmam, Commission Member (District 5)
Robert Jones, Commission Member (District 4)
Melodie Szymkowski, Commission Member (District 2)

City of Bradbury Planning Commission Agenda Report

TO: Honorable Chairperson and Commission Members

FROM: Jim Kasama, City Planner

DATE: September 27, 2023

SUBJECT: MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT AND PROPOSED ORDINANCE AMENDING TITLE IX OF THE BRADBURY MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING

PLANNING COMMISSION RESOLUTION NO. PC 23-315

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT AND PROPOSED ORDINANCE AMENDING TITLE IX OF THE BRADBURY MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING

Attachment

Resolution No. PC 23-315 with Exhibits:

- A) Final Initial Study and Mitigated Negative Declaration
- B) Response to Comments
- C) Mitigation Monitoring and Reporting Program

Agenda Item No. 8B

INTRODUCTION

The City has been in the process of preparing the 6th Cycle Housing Element for the 2021-2029 planning period (the "Housing Element Update") and the programs for the Housing Element Update include the placing of an affordable housing overlay zone on a portion of the Civic Center site. These actions are subject to the California Environmental Quality

Act ("CEQA"). To prepare the environmental document, the City retained Recon Environmental, Inc. This process begins with the Initial Study Checklist, which outlines and specifies the various environmental factors that are to be examined. This process identified two factors that are potentially affected: Cultural Resources and Tribal Cultural Resources; however, with the inclusion of mitigation measures to address these factors, there will not be a significant effect on the environment, and a Mitigated Negative Declaration with a Mitigation Monitoring and Reporting Program was prepared. See Exhibits A and C of the attached Planning Commission Resolution No. PC 23-315.

MITIGATED NEGATIVE DECLARATION

The Initial Study Checklist identified two environmental factors that could potentially be affected by the Housing Element Update. These are Cultural Resources and Tribal Cultural Resources, which include historical items, archaeological items, and human remains that might have been interred outside of formal cemeteries, Tribal cultural resources as defined in Public Resources Code Section 21074, and historical resources listed or eligible for listing in the California Register of Historical Resources or a local register as defined in Public Resources Code Section 5020.1(k).

All other environmental factors were determined to have no impact or be of less than significant impact. As part of the preparation of the Initial Study and Mitigated Negative Declaration ("ISMND"), the Native American Tribes were notified and given the opportunity for consultation in accordance with Senate Bill 18 and Assembly Bill 52. No tribes requested consultation, except that the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation for any activities of ground disturbance that may be proposed in the future.

A Notice of Intent for the ISMND was also issued, and one comment letter was received from the California Department of Fish and Wildlife. A response letter was sent by the City to address the issues raised by the Department of Fish and Wildlife and it was asked if they would like to discuss the project or the City's responses. The Department of Fish and Wildlife did not respond, and no changes were required to the ISMND. See Exhibit B of the attached Resolution No. PC 23-315.

The Housing Element Update will not impact Cultural or Tribal Cultural Resources, but the zoning amendment to place an affordable housing overlay zone on the Civic Center site raises the potential for the eventual development of the rear/easterly portion of the site. The excavation that could occur for any such development has the potential to encounter buried cultural resources. To mitigate this potentially significant impact to Cultural and Tribal Cultural Resources, the Gabrieleno Band of Mission Indians – Kizh Nation shall be consulted prior to any ground disturbing activities, and the construction activities will be monitored, and measures are included for the appropriate handling of any significant cultural resources that are discovered – see Section 4.5 beginning on page 22, and Section 4.18 beginning on page 45 of the Final Initial Study and Mitigated Negative Declaration ("ISMND").

It was determined that there is no indication of a likelihood that human remains would be encountered on the Civic Center site, but to ensure that any such impact would be less

than significant, it is noted that Health and Safety Code Section 7050.5 would be applicable during grading and it requires that in the event human remains or remains that may be human are discovered, that construction activities be halted and the County Coroner notified. Furthermore, if it is determined that the remains are of Native American origin, the Native American Heritage Commission is to be notified. By complying with these applicable regulations, any impacts would be less than significant.

FINDINGS

The following California Environmental Quality Act findings are applicable regarding impacts related to the Housing Element Update and affordable housing overlay zone:

- A Mitigated Negative Declaration was prepared for the Housing Element Update and related programs, including the placing of an affordable housing overlay zone on a portion of the Civic Center site as all potential impacts can be mitigated to below a level of significance.
- The Mitigated Negative Declaration identified two topic areas; Cultural Resources and Tribal Cultural Resources as potentially significant, but each can be mitigated below a level of significance.
- All other topic areas would have less than significant impact.

PLANNING COMMISSION ACTION

The Planning Commission is to open a public hearing and solicit testimony on the ISMND and accompanying documents.

After the testimony, the Commission is to close the public hearing and determine that the findings can be made to recommend approval of the ISMND and approve a motion to adopt the attached Resolution No. PC 23-315. The Commission's comments and specific recommendations will be transmitted to the City Council with the resolution.

ATTACHMENT

Resolution No. PC 23-315 with Exhibits:

- A) Final Initial Study and Mitigated Negative Declaration
- B) Response to Comments
- C) Mitigation Monitoring and Reporting Program

AGENDA ITEM NO. 8B – ATTACHMENT

PLANNING COMMISSION RESOLUTION NO. PC 23-315

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF THE MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE 2021-2029 (6TH CYCLE) HOUSING ELEMENT AND PROPOSED ORDINANCE AMENDING TITLE IX OF THE BRADBURY MUNICIPAL CODE RELATING TO AFFORDABLE HOUSING

With Exhibits:

- A) Final Initial Study and Mitigated Negative Declaration
- B) Response to Comments
- C) Mitigation Monitoring and Reporting Program

PLANNING COMMISSION RESOLUTION NO. PC 23-315

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL ADOPTION OF THE MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM RELATING TO THE 6TH CYCLE HOUSING ELEMENT UPDATE AND ZONING AMENDMENTS

WHEREAS, the City has been in the process of preparing and adopting a 6th Cycle Housing Element for the 2021-2029 period ("Housing Element Update"); and

WHEREAS, one of the programs in the Housing Element Update is for the City to rezone a portion of the Civic Center site to allow affordable housing for 18 units plus an emergency shelter for 6 individuals; and

WHEREAS, Recon Environmental, Inc. ("Recon") was hired to prepare the environmental documentation associated with the City's Housing Element Update and related actions through the City's Housing Consultant; and

WHEREAS, on September 27, 2023, the Planning Commission held a duly noticed public hearing at which time it considered all evidence presented, both written and oral;

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. CEQA Procedures. The Planning Commission of the City of Bradbury does hereby find as follows:

A. In accordance with AB 52 and SB 18, the City sent notices regarding tribal consultation. The only Tribe to respond was the Gabrieleno Band of Mission Indians – Kizh Nation ("Kizh"). By email dated April 12, 2022, the Tribe indicated that because there would not be any ground disturbances, there was no need for consultation.

B. Recon prepared an Initial Study/Mitigated Negative Declaration (hereafter "MND"). A Notice of Intent to adopt the MND was timely distributed and the public review period was then extended to run from February 27, 2023 to March 28, 2023 to coincide with the availability of the public release of the 6th Cycle Housing Element.

C. On March 24, 2023, the City received a public comment from the California Department of Fish and Wildlife ("CDFW") and on April 19, 2023, the City sent a response letter to the issues raised by the CDFW, asking if they would like to discuss the project or the City's responses. No further communication was received from CDFW. No changes were required to the MND or Mitigation Measures.

D. After Recon prepared the MND, changes were made to the Housing Element. However, the changes that were made related to providing further technical

information and additional changes to programs that would not have any environmental impacts. These changes did not create any impacts that were not already examined as part of the MND and no revisions were required as a result of these changes.

SECTION 2. CEQA Findings Regarding Impacts.

A. An MND was prepared for the Project as all potential impacts can be mitigated below a level of significance.

B. The MND identifies the below topic areas as potentially significant, but each can be mitigated below a level of significance.

1. Under Cultural Resources, at the time of development of the City Hall site, there is a potential to encounter buried cultural resources. This potential impact will be mitigated by Mitigation Measure MM CUL-1 which will require consultation with the Kizh and the establishment of a construction monitoring program as further spelled out in the Mitigation Monitoring and Reporting Program.

2. Under Tribal Cultural Resources, at the time of development of the City Hall site, there is a potential that significant tribal cultural resources could be encountered. Mitigation Measure MM CUL-1 will mitigate this impact as well.

C. All other topic areas would have a less than significant impact.

SECTION 3. Adoption of MND and MMRP.

A. Based on the above, the Planning Commission hereby recommends that the City Council approve and adopt the Final and Complete Initial Study/Mitigated Negative Declaration attached hereto which consists of the Final Initial Study Checklist and Mitigated Negative Declaration attached hereto as Exhibit A (Final IS/MND) and the Response to Comment letter attached hereto as Exhibit B. The Planning Commission further recommends that the City Council adopt the Mitigation Monitoring and Reporting Program attached hereto as Exhibit C.

B. In recommending adoption of the MND and Mitigation Monitoring and Reporting Program, the Planning Commission has exercised its independent judgement and analysis. The MND is an accurate and complete statement of potential environmental impacts of the Project. The Planning Commission has reviewed and considered the MND, agenda reports, written reports, public testimony, and other information in the record.

SECTION 4. Custodian of Record. Each and every one of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the Project. All summaries of information in the findings which precede this section are based on the entire record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The documents and materials that constitute the record of proceedings on which these findings and recommendations are

based are located in City Hall. The Custodian of Record is the City Clerk, Diane Jensen, who can be reached at (626) 358-3218, or by email at djensen@cityofbradbury.org.

SECTION 5. Summaries of Information. All summaries of information in the findings, which precede this section, are based on the substantial evidence in the record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact.

SECTION 6. Effective Date. This Resolution shall become effective immediately.

SECTION 7. Certification. The City Clerk shall certify the passage of this resolution.

PASSED, APPROVED, AND ADOPTED this 27th day of September, 2023.

Chairperson

ATTEST:

City Clerk

I, Diane Jensen, City Clerk, hereby certify that the foregoing Resolution No. PC 23-315 was duly adopted by the Planning Commission of the City of Bradbury, California, at a regular meeting held on the 27th day of September, 2023, by the following vote:

AYES:

NOES:

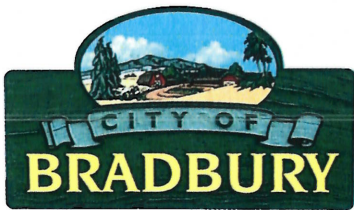
ABSTAIN:

ABSENT:

EXHIBIT A

Final IS/MND

Final Initial Study Checklist and Mitigated Negative Declaration for the City of Bradbury
2021-2029 6th Cycle Housing Element Update and Zoning Amendments



Final

Initial Study Checklist and Mitigated Negative Declaration for the City of Bradbury 2021-2029 6th Cycle Housing Element Update and Zoning Amendments Bradbury, California

Prepared for
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600 Winston Avenue
Bradbury, CA 91008

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1.0 Introduction

This Initial Study Checklist and Mitigated Negative Declaration (IS/MND) has been prepared in accordance with relevant provisions of the California Environmental Quality Act (CEQA) of 1970, as amended, and the CEQA Guidelines, as revised. This IS/MND evaluates the environmental effects of the City of Bradbury 2021-2029 Housing Element Update (HEU) and the amendments to Chapter 88 of Title IX to allow affordable housing at the rate of 20-35 dwelling units per acre in the Affordable Housing Overlay Zone (AHOZ), and placing the AHOZ on the City Hall site (amending Chapter 88 and placing that AHOZ on the City Hall site are collectively referred to as the Zoning Actions).

The IS/MND includes the following components:

- A Draft MND and findings made by the City of Bradbury (City) that the project would not result in any significant effects on the environment, as identified in the CEQA IS Checklist.
- A detailed project description.
- The CEQA IS Checklist, which provides standards to evaluate the potential for significant environmental impacts from the project, and is adapted from Appendix G of the CEQA Guidelines. The project is evaluated in all environmental issue categories to determine whether the project's environmental impacts would be significant in any category. Brief discussions are provided that further substantiate the project's anticipated environmental impacts in each category.

Because the project fits into the definition of a "project" under Public Resources Code Section 21065 requiring discretionary approvals by the City, and because it could result in a significant effect on the environment, the project is subject to CEQA review. The IS Checklist was prepared to determine the appropriate environmental document to satisfy CEQA requirements: an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND). The analysis in this IS Checklist supports the conclusion that the project would not result in significant environmental impacts.

This IS/MND will be circulated for 30 days for public and agency review, during which time individuals and agencies may submit comments on the adequacy of the environmental review. Following the public review period, the City Council will consider any comments received on the IS/MND when deciding whether to adopt the IS/MND.

2.0 Draft Mitigated Negative Declaration

Project Name: City of Bradbury 6th Cycle 2021-2029 Housing Element Update and Zoning Amendments

Project Location: Citywide

Project Description: The proposed project involves an update to the Housing Element of the City's General Plan. The proposed Housing Element Update establishes programs, policies, and actions to further the goal of meeting the existing and projected housing needs of all family income levels of the community, provides evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments (SCAG). To meet the City's RHNA for lower income households, the City has primarily identified affordable housing opportunities through Accessory Dwelling Units (ADUs) and Single-Room Occupancy (SRO) developments. The City has also identified opportunity for affordable housing development at the City Hall site located at 600 Winston Avenue. The Housing Element includes a program to modify the Affordable Housing Overlay Zone (Chapter 88 of the City's Development Code) to allow for multi-family affordable housing at a density range of 20-35 units per acre, through application of the Overlay Zone to the City Hall site. The Affordable Housing Overlay Zone would be applied to the City Hall site either prior to or concurrent with adoption of the Housing Element. The Affordable Housing Overlay Zone already allows an emergency shelter as an allowable land use. As a result, this Initial Study Checklist includes an evaluation of development of an 18-unit multi-family affordable development, based on development on up to 0.55 acre of the City Hall site at a density of 35 dwelling units per acre (du/ac) and an emergency shelter for up to six persons on the rear parking lot portion of the City Hall site.

Findings: Pursuant to the provisions of CEQA (Public Resources Code, Section 21000 et seq.) and based on information contained in the attached IS Checklist, the City of Bradbury has determined that the project will not have a significant effect on the environment.



Signature of Lead Agency Representative



Date

Signature of Lead Agency Representative

Date

3.0 Project Description

1. Project:

City of Bradbury 2021-2029 6th Cycle Housing Element Update and Zoning Actions to amend Chapter 88 of the Development Code to allow a 20-35 dwelling unit per acre affordable housing project in the Affordable Housing Overlay Zone and placing the Affordable Housing Overlay Zone on the City Hall site.

2. Lead Agency:

City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

3. Contact Person and Phone Number:

Kevin R. Kearney, City Manager
City of Bradbury
(626) 358-3218
kkearney@cityofbradbury.org

4. Project Location:

The City of Bradbury 2021-2029 Housing Element Update (HEU) would apply to the entire geographic area located within the boundaries of the City, which encompasses 1.9 square miles. Figure 1 shows the boundaries of the City within the southern California region. The project additionally includes application of the Affordable Housing Overlay Zone to the City Hall site located at 600 Winston Avenue (Figures 2 and 3).

5. Project Applicant/Sponsor:

City of Bradbury
Bradbury City Hall
600 Winston Avenue
Bradbury, CA 91008

6. General Plan Designation:

Varies
City Hall Site: Public Facilities

7. Zoning:

Varies
City Hall site: A-1 zone

8. Background

State law requires that a jurisdiction evaluate its housing element according to a schedule established for each region in the state to determine its effectiveness in achieving city and state housing goals and objectives, and to adopt an updated Housing Element that reflects the results of this evaluation. Pursuant to the update cycle for jurisdictions within the SCAG region, the City's HEU covers the eight-year, 2021-2029 6th Cycle planning period.

The City is a small, residential/equestrian-oriented community of less than 1,000 residents. The City also has one of the highest median incomes of the San Gabriel region and more than twice Los Angeles County's (County) median income. The majority (97 percent) of the housing in the City is single-family, detached units. Like the rest of California, home prices have increased significantly in the past 20 years.

9. Description of 2021-2029 Housing Element Update and Zoning Actions:

The project is a General Plan Amendment to update the City's Housing Element for the planning period of 2021-2029 (hereafter, HEU) and Zoning Actions described below. The proposed HEU is available on the City's website at:

https://www.cityofbradbury.org/services/planning_department/housing_element.php

This Initial Study evaluates the potential environmental impacts expected to result from adoption of the HEU and Zoning Actions; however, no physical development is proposed at this time.

The City has been assigned a RHNA of 41 units. Based on the City's current capacity, the City is able to meet its RHNA of 41 units through development on vacant and underutilized sites, specifically through development of SRO developments and ADUs within existing single-family residential lots, which are already allowed uses in the City. The City would additionally amend Chapter 88 of the Development Code to allow affordable housing at a rate of 20–35 du/acre and place the Affordable Housing Overlay Zone on the City Hall site. This will facilitate development of up to 18 multi-family units on an area that is 0.55 acre in size and an emergency shelter for individuals on another 0.13-acre portion of the site.

The Housing Element identifies a number of actions that would be required to facilitate and promote development of affordable units, including but not limited to:

- **Affordable Housing Overlay Zone** – The HEU proposes to amend the Affordable Housing Overlay Zone to include affordable multi-family housing (at a density between 20 and 35 units per acre) as an allowable use and to establish appropriate development standards for multi-family housing. The HEU proposes placing the Affordable Housing Overlay Zone on the City Hall property and a corresponding zone change implements this (the Zoning Actions) (Figure 4).
- **Replacement Housing** – By the end of 2022, amend the Development Code to comply with Assembly Bill (AB) 1397 (Replacement Housing) to require, as a condition of project approval, the replacement of existing units on-site that are either deed restricted or occupied by lower income households.
- **ADUs and Junior ADUs (JADUs)** – Facilitate the development of eight ADUs/JADUs over Housing Element planning period by developing pre-approved plans for detached ADUs to streamline approval, updating the City website to include resources to assist in ADU development, and

create an ADU handout that includes information on standards for the variety of accessory living quarters permitted in the City.

Implementation of the Replacement Housing programs would not result in physical impact on the environment. Similarly, ADUs and JADUs are already an allowed use in the City. The focus of the environmental analysis is related to implementation zoning changes to implement an Affordable Housing Overlay Zone on the City Hall site to allow affordable housing at a rate of 20–35 du/acre (up to 18 multi-family units) and an emergency shelter for up to 6 individuals.

10. Surrounding Land Use(s) and Project Setting:

The City is a small, residential/equestrian-oriented community of approximately 1,000 nestled at the base of the San Gabriel Mountains below the Angeles National Forest in Los Angeles County. The community encompasses 1.9 square miles and includes 3.5 miles of public streets and roads. The City is bordered on the north and west by the City of Monrovia, the Angeles National Forest to the north, and on the south and east by the City of Duarte.

The 1.1-acre City Hall site includes City Hall (a converted and expanded residential structure) and contains open space and paved parking areas. The City Hall site is bordered by single-family residential land uses to the north, south, and west, and by the Royal Oaks Manor senior living community to the east that is in unincorporated Los Angeles County territory.

11. Other Required Agency Approvals or Permits Required:

None required.

12. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

The City of Bradbury, as lead agency, formally notified California Native American tribes of the opportunity to consult via letter in accordance with Senate Bill (SB) 18 and AB 52 on March 29, 2022. No tribes requested formal consultation; however, the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation for any activities with ground disturbance that may be proposed in the future.

Summary of Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |

- | | | |
|--|---|---|
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report (EIR) or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Figure 1: Regional Location

Figure 2: Project Location on USGS Map

Figure 3: Project Location on Aerial Photograph

Figure 4: City Hall on an Aerial Photograph

4.0 Initial Study Checklist

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved. A “No Impact” answer should be explained where it is based on project specific factors as well as general standards.
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. Section 15063(c)(3)(D).
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 Aesthetics

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a-d: Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units plus an emergency shelter for up to six persons.

Development of SRO and ADU units would occur within existing private residential lots. While many residential areas in the City have scenic qualities, adverse impacts to scenic vistas are not anticipated from development of SRO and ADU units based on the 16-foot height limitation for ADUs and 28 feet for Accessory Living Quarters including SRO developments (which may be constructed as an upstairs unit).

Additionally, all accessory living quarters are required to comply with the following findings from the City's Development Code which would ensure potential adverse effects to scenic resources are considered during building plan review:

- (a) The accessory living quarter(s) will be appropriate to the size and character of the lot on which it will be located, and to the character of the neighborhood.

- (b) The accessory living quarter(s) will not overload the capacity of the neighborhood to absorb the physical and use impacts of the unit(s) in terms of parking, adequacy of water and sewer services, traffic volumes and flows, emergency evacuation capacity, and utilities consumption.
- (c) The accessory living quarter(s) will not be materially detrimental to the public health, safety, and general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.

The HEU proposes to amend the Affordable Housing Overlay Zone (Chapter 88) to include affordable multi-family housing (at a density between 20 and 35 units per acre) as an allowable use and to establish appropriate development standards for multi-family housing. The HEU proposes placing the Affordable Housing Overlay zone on the City Hall property, which would facilitate development of up to 18 multi-family residential units on the City Hall site as well as an emergency shelter for six individuals. Future development at the City Hall site would occur within underutilized portions including the parking and open space areas and would not be anticipated to adversely affect scenic views or resources. No scenic highways are present within the vicinity of the site and development would be subject to development standards regulating setbacks, height (up to 28 feet) and required lot areas and width.

All lighting associated with future housing facilitated by adoption of the HEU would be required to comply with City Municipal Code Section 9.100.100 that requires that exterior lighting shall be hooded and arranged to reflect away from adjoining properties and streets, and may not, at any given time, create blight to those who reside, work, and travel in the City or endanger life, safety and welfare or economic, aesthetic and safety acts inconsistent with the health, safety and general welfare of the community.

Future development facilitated by adoption of the HEU and application of the Affordable Housing Overlay Zone to the City Hall site would result in less than significant impacts related to scenic vistas, public views, and scenic resources. Impacts related to aesthetics would be less than significant.

4.2 Agriculture and Forestry Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EXPLANATIONS:**a-b. No Impact**

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units in addition to an emergency shelter for six individuals.

The City Hall site and surrounding land uses are designated as Urban and Built-Up Land by the California Department of Conservation (DOC) Important Farmland Mapping and Monitoring Program (FMMP) (California Department of Conservation 2016).

The City Hall site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the California Important Farmland map produced by the State Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (California Department of Conservation 2016). The HEU does not include programs that would conflict with existing agricultural zoning or a Williamson Act contract. Thus, the HEU and Zoning Actions would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use or conflict with existing zoning for agricultural use, or a Williamson Act Contract. No impacts would occur.

c-d. No Impact

The City Hall site is located in an urbanized setting and is zoned as “A-1,” Agriculture Residential Zoning District according to the City of Bradbury Official Zoning Map (City of Bradbury 2012). The City Hall site’s existing zoning of “A-1” does not support the definitions provided by Public Resources Code (PRC) Section 42526 for timberland, PRC Section 12220(g) for forest land, or California Government Code Section 51104(g) for timberland zoned for production. PRC Section 12220(g) defines forest land as “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” Development of ADUs and SROs on existing residential lots and affordable housing development at the City Hall site would not conflict with existing zoning for forest land or timberland, and no impacts would occur.

e. No Impact

As previously described in Section 4.2(a-d), the HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units in addition to an emergency shelter for six individuals.

There are no active agricultural operations surrounding the City Hall site that could be adversely affected by development on the City Hall site. Furthermore, the addition of SROs and ADUs would be compatible with active agriculture that may exist throughout the City, on existing residential lots. Development of ADUs and SROs on existing residential lots and affordable housing development at the City Hall site would not involve changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use, and no impacts would occur.

4.3 Air Quality

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:**a-d. Less than Significant Impact**

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. The City is within the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the SCAB. The SCAQMD has an Air Quality Management Plan (AQMP) that proposes policies and measures to achieve federal and state standards for healthful air quality in the SCAB. The 2022 AQMP incorporates land use assumptions from local general plans and regional growth projections developed by the SCAG to estimate stationary and mobile air emissions associated with projected population and planned land uses. If the proposed land use is consistent with the local general plan, then the impact of the project is presumed to have been accounted for in the AQMP. This is because the land use and transportation control sections of the AQMP are based on the SCAG regional growth forecasts, which incorporated projections from local general plans.

Another measurement tool in determining consistency with the AQMP is to determine whether a project would generate population and employment growth and, if so, whether that growth would exceed the growth rates forecasted in the AQMP and how the project would accommodate the expected increase in population or employment. The project would result in additional housing opportunities throughout the City consistent with the RHNA of 41 units. As a relatively small number of units compared to the SCAG region as a whole, the HEU is not significantly different from the growth assumptions assumed in the AQMP. Additionally, SROs and ADUs associated with single-family residences in the City are largely supporting employment. Therefore, the RHNA of 41 units would not conflict with an applicable air quality plan.

Another factor used to determine if a project would conflict with implementation of the 2022 AQMP is determining if the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS]) or interim emissions reductions specified in the 2022 AQMP. The SCAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions. These significance thresholds are updated as needed to appropriately represent the most current technical information and attainment status in the SCAB. Given the relatively small number of units, the HEU and the Zoning Actions are not anticipated to result in construction or operational

emissions that would exceed the SCAQMD's significance thresholds. Therefore, the HEU would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard, nor would it expose sensitive receptors to substantial pollutant concentrations.

A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities. The City is a small, residential/equestrian-oriented community with no significant sources of toxic air contaminants. The HEU would not place sensitive land uses in the vicinity of existing sources of air pollution and would not generate substantial pollutant concentrations.

Because the HEU does not affect land uses that are typically associated with the creation of objectionable odors (such as rendering plants, landfills, treatment plants, etc.), which result in other emissions (such as those leading to odors) adversely affecting a substantial number of people its adoption would have a less than significant impact from odors.

Based on the above, the HEU, would result in a less than significant impact relative to air quality.

4.4 Biological Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EXPLANATIONS:**a. Less than Significant Impact**

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or the Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. RECON Environmental, Inc. (RECON) completed a biological survey of the City Hall site on June 20, 2022. Two land cover types were identified within the biological study area: urban/developed and coast live oak woodland (Figure 5). No candidate, sensitive, or special status species were identified on-site. All development would be subject to California Department of Fish and Wildlife (CDFW) Code 3503, which requires protection of nesting birds. Implementation of the HEU and the Zoning Actions would not have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).

b. No Impact

Development of SRO and ADU units would occur within existing private residential lots and would be reviewed for consistency with local or regional plans, policies, and regulations by the CDFW or USFWS. The City Hall site consists of urban/developed land and coast live oak woodland (see Figure 5). The project site does not support any riparian habitat nor does it support any sensitive natural communities identified in local or regional plans, policies, and regulations by the CDFW or the USFWS. Additionally,

the City's Municipal Code would require discretionary review of any project that contains wetlands as defined by the USFWS. No impact would occur.

c. No Impact

Development of SRO and ADU units would occur within existing private residential lots and would be reviewed for potential jurisdictional wetlands or waters. No potential jurisdictional wetlands or waters were observed on the City Hall site. Therefore, there are no anticipated impacts to any jurisdictional wetlands or waterways and no impact would occur.

d. No Impact

Though it is reasonable to assume that urban-adapted species may occur locally within the impact footprint, the City Hall site as a whole does not function as a wildlife movement corridor and there is no indication that the site supports any wildlife nursery sites. Furthermore, the site is bordered by single-family residential land uses on the north, south, and west sides, and a senior living community to the east, and does not connect to open space. Therefore, the project would not result in any impact to wildlife movement or nursery sites and no impact would occur.

e. No Impact

The City's Tree Preservation and Protection ordinance (Part VI, Chapter 118 of the City's Development Code) protects native trees to preserve the beauty of the natural environment. Future development of SROs and ADUs in the City would be subject to this ordinance and no conflicts are anticipated. Regarding the City Hall site, a tree survey was completed in order to document the presence of trees that may be subject to the City's Tree Preservation and Protection Ordinance. An area of coast live oak woodland is located along the northern property line of the City Hall site (see Figure 5). The location of individual coast live oaks with a trunk diameter greater than six inches at breast height is shown on Figure 6. As shown, portions of the oak canopy are excluded from the vegetation mapping as certain areas under the canopy contain hardscape. While these trees would be subject to the City's Tree Preservation and Protection Ordinance, the site contains sufficient disturbed area to accommodate a development while avoiding native oak trees. However, in the event any tree removal is needed to accommodate site development, the provisions of the Tree Preservation and Protection Ordinance would apply and any removals would be completed in accordance with those regulations. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would occur.

f. No Impact

Development of SRO and ADU units would occur within existing private residential lots and would be reviewed for consistency with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP. The City Hall site is not located in a Habitat Conservation Plan (HCP), Natural Communities Conservation Plan (NCCP), or another approved HCP area. The project site does not lie within the boundaries of a designated Los Angeles County's Significant Ecological Area. Thus, the project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP and therefore, no impacts would occur.

Figure 5: Existing Vegetation Communities on the City Hall Site

Figure 6: Existing Trees on the City Hall Site

4.5 Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a. No Impact

As there are no identified historical resources within the project site and the project would not affect properties outside of the project site, the project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5. Therefore, no impact would occur.

b. Potentially Significant Unless Mitigation Incorporated

The City of Bradbury, as lead agency, formally notified California Native American tribes of the opportunity to consult via letter in accordance with SB 18 and AB 52 on March 29, 2022. No tribes requested formal consultation; however, the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation for any activities with ground disturbance that may be proposed in the future. At the time the City Hall site is developed, there is a potential to encounter buried cultural resources. In order to mitigate significant impacts to undiscovered significant archaeological features from ground disturbing activities, implementation of a construction monitoring program as identified in mitigation measure CUL-1 would be implemented, detailed below. This measure would include a requirement to consult with the Gabrieleno Band of Mission Indians – Kizh Nation and would require archaeological and tribal monitors to be present during ground disturbing activities. Implementation of this measure would reduce impacts to a less than significant level with mitigation.

MM CUL-1: In order to mitigate potentially significant impacts to buried archaeological features from ground disturbing activities, implementation of a construction monitoring program would be implemented as follows:

- Prior to any ground disturbing activities, the Gabrieleno Band of Mission Indians – Kizh Nation shall be consulted.

- An archaeological Principal Investigator and a local Native American monitor will attend a pre-construction meeting prior to ground-disturbing activities. The responsibilities and obligations of the monitors will be reviewed at this meeting.
- The Principal Investigator and local Native American monitor will be present during ground-disturbing activities, such as grading and trenching into native soils.
- If previously unidentified potentially significant cultural resources are discovered, construction activities should be diverted away from the discovery and the resources should be evaluated for significance. Isolates and non-significant deposits shall be minimally documented in the field. Significant archaeological discoveries include intact features, stratified deposits, previously unknown archaeological sites, and human remains. The Principal Investigator shall inform the City of the discovery and together with the Native American monitor determine its significance. To mitigate potential impacts to significant cultural resources, a Research Design and Data Recovery Program shall be prepared by the Principal Investigator, approved by the City, and implemented using professional archaeological methods. Construction activities would be allowed to resume after the completion of the recovery of an adequate sample and the recordation of features.
- All cultural material collected during the monitoring and data recovery program shall be processed and curated at Los Angeles County facility that meets federal standards per 36 Code of Federal Regulations Part 79 unless the tribal monitors request the collection.
- If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) will be followed. The principal investigator shall contact the County Coroner.
- After the completion of the monitoring, the archaeological Principal Investigator shall prepare a report. If no significant cultural resources are discovered, a brief letter shall be prepared. If significant cultural resources are discovered, a report with the results of the monitoring and data recovery (including the interpretation of the data within the research context) shall be prepared.

c. Less than Significant Impact

The archaeological survey of the City Hall site did not indicate the likelihood of human remains on the site; however, in the event human remains are present, Health and Safety Code Section 7050.5 would apply during grading. Applicability of this regulation is referenced in mitigation measure CUL-1 above. This regulation requires that in the event that human remains (or remains that may be human) are discovered at the implementing development project site during grading or earthmoving, the construction contractors shall immediately stop all activities in the immediate area of the find. The project proponent shall then inform the local County Coroner and the City of Bradbury Planning Division, and the coroner would be permitted to examine the remains. If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC) and the Commission would identify the "Most Likely Descendent." In the event human remains are discovered during project construction, the project would comply with applicable regulations, thereby ensuring impacts would be less than significant.

4.6 Energy

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a-b. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

While energy resources would be consumed during construction and operation of future development, potential impacts to energy resources of any specific future residential projects would need to meet the City's Housing Element Section O requirement of performing analysis of energy conservation opportunities as well as promote energy conservation and affordable housing, and implementation of Climate Action Plan policies contained within the City of Bradbury General Plan, 2012-2030, which include a number of actions to promote energy efficiency in new development. The HEU would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, nor would it conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Based on the above, implementation of the HEU and Zoning Actions would result in less than significant impacts related to energy resources.

4.7 Geology and Soils

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:**a. (i-iv). Less than Significant Impact**

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and emergency shelters for six individuals. Development of SRO and ADU units would occur within existing private residential lots.

Similar to most areas in southern California, the City lies within a region known to be seismically active and is subject to periodic seismic shaking due to earthquakes along remote or regional faults. Therefore, the potential exists for people and structures associated with new residential projects to be exposed to strong ground shaking, ground failure, and soil instability. The City is located on the Sierra Madre-Cucamonga Fault Zone according to mapping by the California Department of Conservation, California Geologic Survey (2022). The active Sierra Madre and Duarte faults are mapped running northwest to southeast through the southern portion the City, respectively. The San Gabriel and Verdugo faults are mapped approximately 12 miles north and 12 miles west of the City, respectively. All future development implemented to achieve the City's RHNA would be conducted in accordance with the City's grading guidelines, the current California Building Codes, and the specifications outlined in project-specific geotechnical investigations. Future projects would be required to comply with all relevant building standards ensuring that impacts associated with seismic hazards would be less than significant.

b. Less than Significant Impact

Potential erosion and sedimentation impacts would be temporarily increased as a result of proposed construction, through activities such as excavation, grading, and removal of surface stabilizing features (e.g., vegetation and pavement). Off-site sediment transport can adversely affect downstream receiving water quality, such as increased turbidity and by providing a transport mechanism for other contaminants to adhere to sediment particles (e.g., hydrocarbons). Future development within the housing sites would be required to implement best management practices to control and prevent runoff and erosion. Developed areas would be most susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in

landscaped areas. All disturbed areas would be stabilized through either construction of structures/hardscape or through landscape installation consistent with the City's Water Efficient Landscape Ordinance which includes requirements for planting disturbed areas and implementing stormwater management practices to minimize runoff and erosion. Short-term erosion and sedimentation impacts would be addressed through conformance with local stormwater regulations and related National Pollutant Discharge Elimination System (NPDES) standards. Stormwater and landscape regulations combined with the NPDES Construction General Permit, would ensure the project would be managed in a way to avoid substantial erosion or loss of topsoils.

c and d. Less than Significant Impact

Geologic hazards associated with seismic waves including ground rupture, ground shaking, landslides, flooding, and liquefaction may be experienced by the City (2012 General Plan Safety Element, page 20). Potential impacts associated with landslide, liquefaction, and expansive soils of any specific future residential projects would be assessed at the time the projects are proposed. Future projects must comply with the recommendations of the project-specific preliminary geotechnical investigation required during the grading and building permit process, which would ensure removal of unsuitable soils and proper fill and compaction to avoid assessed hazards. Therefore, impacts related to landslide and/or liquefaction, or expansive soils would be less than significant.

e. Less than Significant Impact

Development of the City Hall site would connect to existing sewer lines and be served by public sewer. However, the majority of the City is served on septic and depending on the location, future development in the City could require septic tanks or alternative wastewater disposal systems. The state Onsite Wastewater Treatment Systems (OWTS) Policy, required by AB 885, sets standards for wastewater treatment and monitoring requirements. It also authorizes the state, through the Regional Water Boards to authorize local governments to approve OWTS for domestic wastewater through a Local Area Management Program (LAMP). The Los Angeles County Code defines the guidelines and regulations for efficient systems to appropriately dispose of waste through OWTS. Future development would be required to receive OWTS approval from the Los Angeles County Department of Public Health under the provisions of the LAMP to residents of the City. Therefore, impacts would be less than significant.

f. Less than Significant Impact

Depending on the location, future development in the City has the potential to disturb paleontological resources. While the project would amend regulations to support development of SROs and ADUs, these residential units are already allowed on single-family residential land without further discretionary review. Extensive grading or excavation is not anticipated to support these housing types. Similarly, development at the City Hall site is planned to occur within the existing disturbed portion of the site. Due to prior grading and development of the site, the potential for redevelopment to result in impacts to underlying geologic formations that may contain paleontological resources is considered low. Implementation of the HEU and Zoning Actions would result in a less than significant impact to paleontological resources.

4.8 Greenhouse Gas Emissions

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a and b. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

According to the U.S. Environmental Protection Agency, the burning of fossil fuels, along with deforestation, has caused the concentrations of heat-trapping greenhouse gases (GHGs) to increase significantly in the earth's atmosphere. The increase in GHGs results in global warming, as more heat is trapped in the atmosphere. Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Typically, mobile sources make up the majority of direct emissions. Indirect GHG emissions are generated by incremental electricity consumption, water and wastewater consumption, and solid waste generation.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the South Coast Air Basin. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – *Interim CEQA GHG Significance Thresholds for Stationary Sources, Rules, and Plans*, which could be applied by lead agencies. The working group met again in 2010 to review the guidance. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The SCAQMD has identified a GHG screening threshold of 3,000 metric tons of carbon dioxide equivalent (MT CO₂E) annually for residential land uses (SCAQMD 2008, 2010). The California Air Pollution Control Officers Association (CAPCOA 2008), estimates emissions associated with 50 single family homes would generate approximately 900 MT CO₂E. Based on these estimates, the construction and operation of 41 multi-family housing units and an emergency shelter for six individuals would generate less than 900 MT CO₂E and would result in total GHG emissions far less than 3,000 MT CO₂E.

Therefore, the HEU would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

State GHG emissions reduction targets proposed and/or codified by Executive Order (EO) S-3-05, AB 32, EO B-30-15, and SB 32 include achieving 1990 emission levels by 2020 (which the state has achieved); 40 percent below 1990 levels by 2030; and 80 percent below 1990 levels by 2050. The City has adopted a Climate Action Plan (CAP) as part of its General Plan that contains climate action goals, objectives, and policies to achieve identified energy efficiency measures that can be taken to reduce GHG emissions from City operations and from development in its jurisdiction. The HEU establishes goals, measures, and actions related to reducing GHG emissions. Policy 7 of the HEU is to promote and encourage energy conservation and affordable housing. The City will implement an Energy Conservation Program to provide informational materials on green building techniques and materials and will provide data to property owners and builders. The City will work with the San Gabriel Valley Council of Governments, the San Gabriel Valley Energy Wise Partnership, and others in implementation of its Climate Action Plan, and will report annually on its progress. The City also promotes energy conservation by advertising utility rebate programs and energy audits available through Southern California Edison (SCE), and the Southern California Gas Company. Future development would be required to meet the mandatory energy and water conservation requirements of CALGreen and the California Energy Code. Because the project would result in GHG emissions that would be less than 3,000 MT CO₂E annually and would implement measures consistent with the CAP, the HEU and Zoning Actions would not conflict with the City's CAP or an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs, and impacts would be less than significant.

4.9 Hazards and Hazardous Materials

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:**a-c. No Impact**

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. The HEU and Zoning Actions would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous material, nor create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment because the project supports additional housing opportunities in the City and would not introduce any uses that would be associated with hazardous emissions. A database search was completed of the California Department of Toxic Substances Control (DTSC) Envirostor Database (2022) and the State Water Resources Control Board GeoTracker sites to identify if any contaminated sites exist in the vicinity of City Hall that would have the potential to result in hazardous emissions or handling of acutely hazardous materials or substances. No sites were identified within one-half mile of the site. The closest active hazardous material cleanup sites to the City Hall site are approximately 1 mile southeast and 1.3 miles west. Therefore, the HEU would not result in

potential impacts from hazards and hazardous material that may endanger residents or the environment, result in routine transport, use, or disposal of hazardous material. No impact would occur.

d. Less than Significant Impact

As described in 4.9 (a-c), the closest active hazardous material cleanup sites to the City Hall site are approximately 1 mile southeast and 1.3 miles west. The sites of proposed future residential projects would be evaluated using appropriate databases including the California Department of Toxic Substances Control EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects would be assessed at the time the projects are actually proposed. Therefore, the HEU and Zoning Actions would result in less than significant impact relative to hazardous materials.

e. No Impact

The City is not located within an airport land use plan or within two miles of a public airport or public use airport; therefore, any development pursuant to the HEU and Zoning Actions would not result in an airport related safety hazard for people residing or working in the project area. The San Gabriel Valley Airport Influence Area (AIA) is located five miles away from the project site. Therefore, the HEU and Zoning Actions would result in no impact relative to airport hazards.

f. No Impact

The HEU and Zoning Actions would be consistent with all related General Plan policies. This includes the City's emergency response plans. The addition of SROs, ADUs, a multi-unit residential project, and an emergency shelter at the City Hall site would not have the potential to physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the HEU and Zoning Actions would result in no impact relative to emergency or evacuation plans.

g. Less than Significant Impact

Almost the entire City is located within the Very High Fire Hazard Severity Zone (California Department of Forestry and Fire Protection [CAL FIRE] 2021). Therefore, future development of the City Hall site, SROs and ADUs in this zone within the City must comply with the fire hazard construction requirements specified in Chapters 7-A and 15 of the California Building Code and the 2019 International Fire Code (or subsequent amendments). Development would be reviewed for consistency with fire protection safety standards of California Building Code Chapter 7A in areas containing direct or indirect fire hazards. All construction in the City would be inspected by a building inspector for conformance with the approved plans as well as City and State Building and Safety Codes. Fire inspections are conducted by the Los Angeles County Fire Department.

Additionally, ADUs within Very High Fire Hazard Severity Zones are subject to additional side and rear setbacks and fuel modification requirements and must be equipped with fire sprinklers, among other requirements as detailed in the City's Development Code relating to affordable housing. Adherence to the requirements of the City's Municipal Code in relation to development within Very High Fire Hazard

Severity Zones together with California Building Code requirements applicable to development in fire hazard areas would minimize potential adverse impacts related to wildlife hazard to less than significant.

4.10 Hydrology and Water Quality

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:				
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a and c (i-iv). Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA. Development on the City Hall site and new SRO and ADU units would be required to adhere to all applicable City regulations including the City's Storm Water Retention and Storm Water Pollution Prevention policies as stated in City of Bradbury Municipal Code Section 9.94.070, 9.121.120, 15.04.120, and 15.04.130. which requires projects to incorporate construction and postconstruction Best Management Practices (BMPs) to ensure storm water runoff is controlled in a manner that would minimize water quality degradation. Likewise, the HEU and Zoning Actions would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner, which would result in substantial erosion, increase the rate or amount of surface runoff, exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows. Future projects would be required to employ construction and operational BMPs to control potential erosion and siltation, and control flows and associated velocities to prevent erosion and impacts to the downstream drainage system. Project-specific stormwater management BMPs would be identified and implemented at the time future projects are proposed. Implementation of existing regulations would ensure impacts would be less than significant.

b and e. No Impact

The City of Bradbury is located within the Upper San Gabriel Valley Municipal Water District which provides potable water to the City through its water retailers. Implementation of the HEU and Zoning Actions would not deplete groundwater supplies as groundwater would not be used to support the water needs of future housing. As a result, implementation of the HEU would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

d. Less than Significant Impact

As described in the City's 2012-2030 General Plan Environmental Impact Report, the City is not located in a 100-year flood zone. Reservoirs upstream of the City include the San Gabriel and Morris. The project lies within a mapped dam inundation area for these reservoirs. Figure 8-2 of the 2012-2030 General Plan Safety Element delineates the areas potentially subject to inundation in the event of failure of each dam. The Los Angeles County Department of Public Works manages the San Gabriel and Morris dams as part of its flood control and water supply responsibilities and monitors this infrastructure for safety. Additionally, the City maintains a Hazard Mitigation Plan that includes measures to ensure dam safety. Both seiches and tsunamis are known to occur following earthquakes. However, the City is located inland from the Pacific Ocean and substantially distant from surface water bodies, and would not be impacted by a tsunami or seiche. Further, multi-family and emergency housing at the City Hall site would not involve storage of pollutants that would pose a potential for release if the site was inundated. Therefore, potential impacts related to seiche or tsunami inundation zones, and risk release of pollutants due to such project inundation would be less than significant.

4.11 Land Use and Planning

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a. No Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. Because development would occur within existing private residential lots and at the City Hall site, within established neighborhoods, project implementation would not have the potential to physically divide an established community. No impact would occur.

b. Less than Significant Impact

No conflicts have been identified with General Plan policies adopted for the purpose of mitigating an environmental effect. Adoption of the HEU and the Zoning Actions is required to comply with State Housing Law and to accommodate projected growth in the City. No conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect have been identified. Impacts would be less than significant.

4.12 Mineral Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EXPLANATIONS:

a and b. No Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA, future development would not be anticipated to significantly impact mineral resources. As discussed in the 2012-2030 General Plan Conservation Element, there are no known mineral resources in the City. According to the General Plan Conservation Element, there are no areas known to have significant mineral resources. Therefore, no loss of minerals would occur.

4.13 Noise

Would the project result in:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a-b. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

The Health and Safety Element of the General Plan establishes guidelines for controlling noise in the City. The objective of the Noise Chapter is to maintain and preserve the existing quiet and relative noise free environment in the City. The Noise Chapter establishes residential land use compatibility noise level standards of 65 community noise equivalent level (CNEL) for exterior noise and 45 CNEL for interior noise.

The City also adopted a Noise Ordinance to establish acceptable noise levels generated on private property in residential neighborhoods. It is designed to control unnecessary, excessive and annoying sounds generated from stationary sources that may impact an adjacent property. Chapter 9.127 of the

Municipal Code establishes controls regarding unnecessary, excessive and annoying noise. Specially, no person shall create or allow the creation of noise on any residential property which causes the noise level to exceed the actual measured median ambient noise level, or the presumed ambient noise levels of 55 A-weighted decibels average sound level [dB(A) L_{eq}] between 7 a.m. and 10 p.m. and 50 dB(A) L_{eq} between 10 p.m. and 7 a.m., whichever is greater.

The City's Noise Ordinance provides a means to enforce the existing quiet, noise free environment in the City. Specifically, per the Noise Ordinance the City will continue to:

- Incorporate measures into future residential projects which attenuate exterior noise levels in outdoor activity areas to a maximum of 65 CNEL and interior noise levels to a maximum 45 CNEL.
- Establish through the design review process that schools are located and designed so that they comply with the acoustical criteria promulgated by the California Collaborative for High Performance Schools (CHPS).
- Enforce state vehicle noise regulations (Section 23130, 23130.5, 27150, 27151 and 38275 of the California Vehicle Code) to curtail the use of vehicles equipped with illegal or faulty exhaust systems and "hot rods" exhibiting tire squeal or excessive exhaust noise.
- Enforce the California Noise Insulation Standards (Title 24 California Building Code) for dwellings to ensure an acceptable maximum interior noise level of 45 CNEL in habitable rooms, and maintain adequate noise insulation.
- Strictly enforce acoustical privacy, consistent with the California Noise Insulation Standards and all existing and future requirements outlined in the State Housing Code, for residential construction.
- Prohibit roosters and peacocks in the City.

As stated in Municipal Code Chapter 9.127, creating, maintaining, causing or allowing to be created, caused or maintained, any noise or vibration in a manner prohibited by or not in conformity with the provisions of this Chapter is declared to be a public nuisance and shall be punishable as such. However, per Section 9.127.080 certain activities are exempt from these policies, including construction or demolition work conducted between the hours of 7 a.m. and 7 p.m. on weekdays and the hours of 9 a.m. and 7 p.m. on weekends, excluding holidays.

During construction activities associated with future residential development, the potential would exist for temporary or periodic increases in noise levels and/or ground-borne noise and vibration levels on and adjacent to project sites. The degree of such increases would depend on the type and intensity of construction activity, equipment type used, duration of equipment used, and distance between the noise source and noise receiver. Construction affected by the HEU and Zoning Actions would be limited to SROs, ADUs, one potential 18-unit development at the City Hall site and an emergency shelter for six individuals. Construction equipment with a diesel engine typically generates maximum noise levels from 70 to 95 dB(A) L_{eq} at a distance of 50 feet (Federal Highway Administration [FHWA] 2006). During construction activities, equipment moves to different locations and goes through varying load cycles, and

there are breaks for the operators and for non-equipment tasks, such as measurement. Due to the small size of the City Hall site and the size of the lots where SROs and ADUs could be constructed, only a minimal amount of heavy construction equipment would be used. The loudest piece of construction equipment would be a backhoe. A backhoe generates a noise level of 80 dB(A) L_{eq} with a duty cycle of 40 percent. This results in an average hourly noise level of 76 dB(A) L_{eq} at 50 feet. Although the adjacent uses would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. Construction activities would be subject to the time restrictions specified in Section 9.127.080 of the Municipal Code. With enforcement of the Municipal Code, construction noise impacts are anticipated to be less than significant.

Construction equipment also produces varying levels of groundborne vibration. Based on several federal studies, the threshold of perception is 0.035 in/sec PPV, with 0.24 in/sec PPV being a distinctly perceptible (Caltrans 2013). As discussed, due to the limited size of the potential HEU sites, only a minimal amount of heavy construction equipment would be used. The equipment with the greatest potential to generate groundborne vibration is a jack hammer, which generates a vibration level of 0.035 in/sec PPV at 25 feet. Potential construction activities would not generate excessive ground borne vibration or ground borne noise levels, and impacts would be less than significant. Once operational, residential uses would not be a source of ground borne vibration or ground borne noise.

The noise sources on the HEU sites after completion of construction are anticipated to be those that would be typical of any residential neighborhood, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery. None of these noise sources associated with residential uses are anticipated to violate the City's Municipal Code or result in a substantial permanent increase in existing noise levels. On-site noise levels would be similar in nature to the surrounding development. Further, all future residential uses would be subject to the requirements of Chapter 9.127 of the Municipal Code. With enforcement of the Municipal Code, operational noise impacts are anticipated to be less than significant.

Residential development has the potential to result in incremental increases in long-term noise levels generated by increased vehicular traffic. Because of the primarily low density residential nature of the City, future development is not anticipated to result in the exposure of residential uses to noise levels in excess of the exterior noise level standard of 65 CNEL and the interior noise level standard of 45 CNEL. Additionally, given the relatively small number of units under the RHNA, the HEU and Zoning Actions are not anticipated to generate a significant increase in vehicle traffic noise levels. The City's 2012-2030 General Plan Update explains that traffic is the greatest source of noise in the City, but that roadway sources of traffic that generate significant sources of noise are all outside of City limits (e.g., Hunting Drive, Interstate 201, and Interstate 605). An audible change in noise levels requires a 3 dB increase in noise. A 3 dB increase in transportation noise levels requires a doubling of traffic volumes. Based on an ITE Trip Generation Manual, 11th Edition, vehicle trip generation for an affordable housing project with income limits would generate an average 4.81 trips per dwelling unit. Based on this rate, implementation of a 18-unit affordable housing development at the City Hall site plus an emergency shelter for six individuals would conservatively result in an increase of approximately 106 trips, excluding associated trip rate reductions associated with affordable units near transit. This small amount of traffic would not result in a perceptible permanent increase in ambient noise levels on surrounding roadways. For context, a project would have to add 1,000 trips to a low volume roadway (e.g., 1,000 average daily traffic) in order to result in a 3 dB increase in noise. Roadways with higher volumes would require more

trips to result in a similar 3 dB increase in noise. Thus, vehicle traffic noise impacts would be less than significant.

c. Less than Significant

The City is not located within an airport land use plan or within two miles of a public airport or public use airport; therefore, would not expose people residing or working in the project area to aircraft noise. The San Gabriel Valley Airports Airport Influence Area (AIA) is located five miles away from the project site. Impacts due to aircraft noise would be less than significant.

4.14 Population and Housing

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EXPLANATIONS:

a. and b. No Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

The HEU utilizes the 2021-2029 RHNA to plan for and accommodate population growth. Additionally, the City's General Plan planned for a projected population of 1,540 by the year 2029. According to Chapter 2 of the HEU the City's population is at 833 as of 2019. Based on planned growth, the project would not induce population growth. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA. Future development would occur on existing residential sites and/or the City Hall site and is not anticipated to replace any housing. Therefore, the update would not necessitate the construction of replacement housing elsewhere.

(outside of the City) or result in environmental impacts related to growth. Based on the above, the HEU and Zoning Actions would result in a less than significant impact associated with population and housing.

4.15 Public Services

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a (i-v). Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for up to six individuals.

Future development of SROs and ADUs in the City would be within private residential lots. Thus, increased demand for public services from development of the housing affected by the HEU and Zoning Actions is not expected to be significant. Development of up to 18 multi-family residential units on the City Hall site would result in a demand on public services, but would not require construction of new fire, police, schools, parks or other facilities that could result in environmental impacts. The HEU and Zoning Actions, therefore, would not result in substantial adverse physical impacts associated with the provision

of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed above. Based on the above, the HEU and Zoning Actions would result in less than significant impacts to public services.

4.16 Recreation

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a and b. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU and Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

Additional residential development of the housing promoted by the HEU and Zoning Actions may result in the increased use of existing recreational facilities but would not directly result in the need for construction or expansion of recreational facilities to meet the needs of new residents. The availability, maintenance, and management of park and recreation facilities are covered under the General Plan. As future park needs are identified, such impacts by development projects would be assessed at the time the projects are proposed. Implementation of the HEU would result in a less than significant impact related to recreation.

4.17 Transportation

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with the applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a. Less than Significant Impact

Adoption of the HEU would not conflict with adopted transportation policies, plans, and programs including those supporting transit, bicycle, and pedestrian facilities. Development of the housing promoted by the HEU and Zoning Actions would occur on existing residential lots and would not conflict with transportation infrastructure on neighboring streets. Similarly, development on the City Hall site would not conflict with any plans related to the surrounding circulation system or any circulation-transportation policies from the General Plan or Climate Action Plan, which establishes a plan for a multi-modal transportation system. Impacts related to conflicts with applicable plans would be less than significant.

b. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs,

ADUs (that are already allowed by right) and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

On August 18, 2020, the City adopted Vehicle Miles Traveled (VMT) thresholds of significance for purposes of analyzing transportation impacts under CEQA. The thresholds include project screening criteria consistent with Office of Planning and Research guidelines which screens out projects from further VMT analysis if they fall into the following categories:

- Projects generating less than 110 daily trips.
- Residential projects located in low VMT areas. Low VMT is defined as 15 percent below the subarea VMT metrics for that area.
- Projects within a Transit Priority Area (TPA). A TPA is defined as locations within 0.5 mile of a high-quality transit corridor with 15-minute or less headways during peak commute hours.
- Affordable housing developments.
- Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes.

Development at the City Hall site would be screened out from further review because it would be an affordable housing development and emergency shelter. Therefore, implementation of the HEU would result in a less than significant impact related to VMT and would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

c. Less than Significant Impact

Development of housing as set forth in the HEU and Zoning Actions is not anticipated to increase any transportation hazards as construction would occur within existing lots and no transportation improvements are anticipated that could result in sharp curves, dangerous intersections, or incompatible uses. Impacts would be less than significant.

d. Less than Significant Impact

Development under the HEU and Zoning Actions would not conflict with emergency access within or in the surrounding area. All development would be subject to applicable setbacks to ensure adequate circulation and access. Impacts would be less than significant.

4.18 Tribal Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a (i and ii). Less than Significant Impact

The City of Bradbury, as lead agency, formally notified California Native American tribes of the opportunity to consult via letter in accordance with Senate Bill (SB) 18 and AB 52 on March 29, 2022. No tribes requested formal consultation; however, the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation for any activities with ground disturbance that may be proposed in the future. In order to mitigate significant impacts to potentially significant tribal cultural resources that could be encountered from future ground disturbing activities, implementation of a construction monitoring

program as identified in mitigation measure CUL-1 would be implemented, reducing impacts to a less than significant level.

4.19 Utilities and Service Systems

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provided which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulation related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a-e. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

New residential development affected by the HEU and Zoning Actions would be expected to increase the burden on existing utilities and service systems involving water, wastewater treatment storm water drainage, and solid waste disposal. Proposed development of SRO and ADU units not connected to public services must meet specific requirements for a potable water supply and disposal of wastewater through an OWTS. Approvals for potable water supply are obtained from the Environmental Health Drinking Water Program. The Los Angeles County Department of Public Health enforces OWTS regulations for the City and these requirements must be approved by the City's Building and Safety and Environmental Health Land Use Program. The City Hall site is already served by well-established utilities service systems; therefore, expansion of existing systems or the construction of new systems is not anticipated. Water is provided by Upper San Gabriel Valley Water District and sewer maintenance services are provided by Los Angeles County Sewer Maintenance District. Growth envisioned by the HEU is considered planned growth as it would be consistent with growth projections in the City's General Plan. Therefore, the HEU would not generate solid waste or create a demand on water or sewer facilities in excess of the capacity of local infrastructure. The HEU, therefore, would not result in substantial adverse physical impacts associated with the provision of utilities and service systems and impacts would be less than significant.

4.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a. No Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. Implementation of HEU programs and housing associated with the City's RHNA would not conflict with or substantially impair an adopted emergency response plan or emergency evacuation plan as all development would occur within existing developed areas, using the existing circulation network. No impact would occur.

b. Less than Significant Impact

The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.

Almost the entire City is located within the Very High Fire Hazard Severity Zone (CALFIRE 2021). Potential wildlife impacts associated with new housing in the City was considered in developing the Housing Element and determining where housing would be appropriate in relation to wildfire risk.

Therefore, the HEU accounts for the unique wildfire risks in the City in defining where the RHNA units would be supported. The location of the City at the foothills of San Gabriel Mountains, adjacent to wildfire hazard areas and subject to Santa Ana wind conditions put the entire City in a fire risk zone. In the event of a wildfire, residents could be subject to pollutant concentrations and wildfire risk. However, the anticipated 41 units associated with the City's RHNA would be located within existing developed lots. The requirements of the HEU is anticipated to accommodate SROs and ADUs within existing residential lots which would add additional hardened structures that would be resistant to wildfire based on the requirements for wildfire resistant construction in accordance with the latest codes. Specifically, all future development must comply with the fire hazard construction requirements specified in Chapters 7-A and 15 of the California Building Code and the 2019 International Fire Code (or subsequent amendments). Development would be reviewed for consistency with fire protection safety standards of

California Building Code Chapter 7A in areas containing direct or indirect fire hazards. All construction in the City would be inspected by a building inspector for conformance with the approved plans as well as City and State Building and Safety Codes. Fire inspections are conducted by the LA County Fire Department.

Additionally, ADUs within Very High Fire Hazard Severity Zones are subject to additional side and rear setbacks and fuel modification requirements and must be equipped with fire sprinklers, among other requirements as detailed in the City's Development Code relating to affordable housing. Adherence to the requirements of the City's Municipal Code in relation to development within Very High Fire Hazard Severity Zones together with California Building Code requirements applicable to development in fire hazard areas would minimize potential adverse effects related to wildfire risk hazards.

c.-d. Less than Significant Impact

Implementation of the HEU would not require the installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The HEU is a policy document and the limited housing anticipated and required to be accommodated in the City would comply with fire safety requirements and standards detailed in response b. above.

Additionally, while the project would add potential units within a wildfire hazard area, the project would not introduce development within previously undeveloped areas such that slope instability would be created, resulting in downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. All future housing development would comply with State and local stormwater management standards that requires slope stabilization. Additionally, potential impacts associated with landslides are discussed in Section 4.7. As discussed in that section, implementation of site-specific recommendations provided within a required geotechnical investigation would reduce impacts associated with landslides, slope instability, and mudflows to less than significant. Additionally, risk associated with downstream flooding or landslides would be minimized through compliance with the existing regulatory framework related to flooding and geologic hazards as discussed in Section 4.7 and 4.10. Impacts would be less than significant.

4.21 Mandatory Findings of Significance

Does the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

EXPLANATIONS:

a-c. Less than Significant Impact

The HEU is a policy document and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA, the HEU does not identify, describe, promote, entitle, or permit any particular residential development project. Housing accommodated by the HEU is not anticipated to have a cumulative impact related to habitat; plant or animal communities; rare, endangered, or threatened species; historic resources; or human beings.

5.0 Determination and Preparers

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE FEE DETERMINATION

(Fish and Game Code Section 711.4, Statutes of 2006 – SB 1535)

- [] It is hereby found that this project involves no potential for any adverse effect, either individual or cumulatively, on wildlife resources and that a "Certificate of Fee Exemption" shall be prepared for this project.
- [x] It is hereby found that this project could potentially impact wildlife, individually or cumulatively, and therefore, fees in accordance with Section 711.4(d) of the Fish and Game Code shall be paid to the County Clerk.

Report Preparers

City of Bradbury

Kevin Kearney, City Manager
Lisa Kranitz, Assistant City Attorney

RECON Environmental, Inc., 3111 Camino del Rio North, Suite 600, San Diego, CA 92108

Jennifer Campos, Report Reviewer, Principal
Morgan Weintraub, Report Author, Environmental Analyst
JR Sundberg, Biologist and ISA Certified Arborist
Vanessa Tang, Report Author, Habitat Restoration Assistant
Jessica Fleming, Senior Air Quality, Noise, and GHG Specialist
Stacey Higgins, Senior Production Specialist
Frank McDermott, GIS/UAV Manager

6.0 Sources Consulted

Bradbury, City of

- 2012 Zoning Map.
https://cms7files.revize.com/bradburyca/Document_center/Services/Planning/bradbury_zoning_map.pdf.
- 2014 City of Bradbury General Plan 2012-2030, February.
- 2022 Municipal Code.

California Air Pollution Control Officers Association (CAPCOA)

- 2008 *CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January.

California Department of Conservation (DOC)

- 2016 Farmland Mapping and Monitoring Program. DLRP Important Farmland Finder (ca.gov).
- 2022 Earthquake Zones of Required Investigation, California Geologic Survey, Accessed 6/30/22 at Earthquake Zones of Required Investigation (ca.gov).

California Department of Forestry and Fire Protection (CAL FIRE)

- 2021 Fire Hazard Severity Zones. Map <https://osfm.fire.ca.gov/media/5806/bradbury.pdf>

California Department of Transportation (Caltrans)

2013 Technical Noise Supplement. November.

Department of Toxic Substances Control (DTSC)

2022 Envirostor Database.

Federal Highway Administration (FHWA)

2006 Roadway Construction Noise Model User's Guide. FHWA-HEP-05-054, SOT-VNTSC-FHWA-05-01. Final Report. January 2006.

South Coast Air Quality Management District (SCAQMD)

2008 Draft Guidance Document – *Interim CEQA GHG Significance Thresholds for Stationary Sources, Rules, and Plans*. October.

2010 Greenhouse Gas CEQA Significance Thresholds Stakeholder Working Group 15. September 28, 2010.

U.S. Geological Survey

2022 U.S. Quarternary Faults.

<https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>.

EXHIBIT B

Response to Comments on the Mitigated Negative Declaration for the City of Bradbury
2021-2029 6th Cycle Housing Element Update and Zoning Amendments Project, SCH
#2023020514



Elected Officials

Mayor

Bruce Lathrop, District 4

Mayor Pro-Tem

Richard G. Barakat, District 3

Councilmember

Richard T. Hale, Jr., District 1

Councilmember

D. Montgomery Lewis, District 2

Councilmember

Elizabeth Bruny, District 5

Staff

City Manager

Kevin Kearney

City Clerk

Claudia Saldana

Management Analyst

Sophia Musa

City Attorney

Cary Reisman

Building Inspector

Mark Handler

City Engineer

David Gilbertson

City Planner

Jim Kasama

Finance Director

Suresh Malkani

April 18, 2023

RE: Response to Comments on the Mitigated Negative Declaration for the City of Bradbury 2021-2029 6th Cycle Housing Element Update and Zoning Amendments Project, SCH #2023020514

The City of Bradbury (City) received comments from the California Department of Fish and Wildlife (CDFW) dated March 24, 2023 on the Mitigated Negative Declaration (MND) for the City of Bradbury 2021-2029 6th Cycle Housing Element Update and Zoning Amendments Project, SCH #2023020514. Responses are provided below. The CDFW comment letter including bracketing and numbering corresponding to the responses below is included as Attachment 1.

1. Introductory comments are noted. The comment does not raise a specific issue relating to the adequacy or accuracy of the Draft MND; no response is required.
2. The comment summarizes the City's Housing Element Update. The comment does not raise a specific issue relating to the adequacy or accuracy of the Draft MND; no response is required.
3. An introduction to comments related to biological resources are noted. Responses to individual comments follow.
4. This comment raises concern that the proposed activity will cause impacts to oak woodlands, specifically that it would involve "removal of two individual oak trees and encroach upon 10 other oak trees through branch and root pruning". However, this impact would not occur and is not stated as such in the MND. It is unclear how this impact assumption was made. Section 4.4, Biological Resources, response e. of the Initial

Study Checklist documents the presence of oak trees on the City Hall site, but explains that the site contains sufficient developed area to accommodate the multi-family residential development and emergency shelter. Any future development on the City Hall site would occur within the existing developed footprint. Furthermore, any future development on the site would be subject to the City's Oak Tree Preservation and Protection Ordinance. The Bradbury Code of Ordinances, Title IX, Part VI, Chapter 118 includes the Tree Preservation and Protection regulations for the City. The regulations define native trees and significant trees as follows:

- Native tree means any woody plant species indigenous to the desert, foothills, or canyons of southern California prior to the California Mission Period, provided that the plant has an expected mature trunk size of six inches diameter at breast height (DBH) and has an expected mature height of 15 feet or higher. Giant sequoias (*Sequoiadendron giganteum*), redwoods (*Sequoiadendron sempervirens*), dawn redwoods (*Metasequoia glyptostroboides*), evergreen native oaks (such as *Quercus agrifolia*, *Quercus engelmannii*), deciduous oaks (such as *Quercus lobata* and *Quercus kelloggii*) are to be regarded as important native trees even though they have been planted by man, introduced (or possibly reintroduced) into the southern California foothill and canyon environments.
- Prominent tree means a woody perennial plant with a trunk DBH of six inches or more, and having an expected mature height of 15 feet or higher.
- Significant tree means any non-native or exotic tree with a trunk DBH of six inches or more, and having an expected mature height of 15 feet or higher, and known to survive in the southern California environment.

The MND identifies an area of coast live oak woodland located along the northern property line of the City Hall site (see Figure 5). The location of individual coast live oaks with a trunk diameter greater than six inches at breast height is shown on Figure 6. These individual oak trees would be considered native trees, prominent trees and significant trees pursuant to the City's Tree Preservation and Protection Ordinance. As detailed in Section 9.118.060 of the ordinance, removal of native and/or prominent trees is prohibited unless it meets certain criteria as follows:

Removal of native trees and/or prominent trees. No prominent tree, native tree or any other tree defined in Section 9.118.030 and/or which is of a desirable genus and species shall be removed without first obtaining a permit to do so. The City Manager shall issue such permits only after the presentation of photographs and/or drawings showing that the prominent tree is a significant health or fire hazard or has become an extremely severe detriment to the view of the mountains or valley from house sites. A 14-day waiting period is created hereby,

during which time appeals to any decisions, restrictions or conditions made by the City Manager on the permit may be submitted in writing to the Planning Commission. Should an appeal be filed, the 14-day holding period is extended automatically until the next Planning Commission meeting for which the item can be placed on the agenda.

Since there are no view impacts resulting from the existing oak trees, the only reason they would be removed is if they were creating a significant health or fire hazard. In summary, impacts to oak trees as a result of the Housing Element Update are not anticipated as development is assumed to occur within the existing developed footprint of the City Hall site. Furthermore, as stated throughout the MND, the City's 6th Cycle Housing Element (2021-2029) is a policy document that establishes programs to further the goal of meeting projected housing needs pursuant to the regional housing needs allocation. The project is the adoption of the City's Housing Element and associated Zoning Amendment. The project does not include any development plans that could result in environmental impacts related to oak trees or oak woodland within the City Hall site. Future development would be required to submit building plans demonstrating consistency with the City's Tree Preservation and Protection Ordinance and other relevant regulations to ensure avoidance of indirect impacts including stormwater and grading regulations that require erosion control and water quality best management practices. Additionally, future development would be required to implement General Plan policies including the conservation of oak woodlands (Conservation Policy 8).

5. As detailed in response #4, the project would avoid impacts to oak trees; therefore, mitigation measures are not warranted. No impacts to the critical root zone are anticipated as any future development would occur within lands that are currently developed and paved in the existing condition. The oak tree canopy and root zone of the oak trees present on the City Hall site are already impacted by pavement and development would not expand existing developed areas. Existing oak trees on-site may already be compromised by development within the root protection zone. Nonetheless, the redevelopment at the City Hall site would not require removal of existing oak trees and the project would result in no net loss of oak trees or oak woodlands beyond the existing condition.
6. This comment documents the biological value and functions associated with oak woodlands. Consistent with the City's Tree Preservation and Protection Ordinance and City General Conservation Policy 8, the City agrees that oak woodland provides important biological values and functions. The comment notes that, "Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances." As detailed in these responses, the City would comply with their local ordinance, the Tree Preservation and Protection Ordinance to ensure protection to oak trees. The comment also refers to state ordinances protecting oak woodlands but does not provide any specific references to these protections. The City is aware of Public Resources Code (PRC) Section 21083.4 which requires counties to address conversion of oak woodlands and implementation of mitigation. However, this would not

apply to the City of Bradbury as an incorporated City. Furthermore, it is noted that PRC Section 21083.4(d)(2) includes an exemption for affordable housing projects, which would be applicable to development at the City Hall site. The City acknowledges that oak woodlands are considered a CDFW sensitive vegetation community and accordingly has identified the existing developed portions of the City Hall site as a potential development area for affordable housing and emergency shelter needs in the City. Impacts to oak woodlands are not anticipated.

7. As detailed in responses 4 through 6, significant impacts to oak trees are not anticipated; therefore, mitigation measures are not warranted. Furthermore, no development is currently proposed on the City Hall site. Any future development would be subject to the City of Bradbury applicable ordinances and development permit procedures of Title IX, Part IV, Section. 9.28.060 Environmental Assessment, which requires all projects as defined by the California Environmental Quality Act (CEQA) to be reviewed and processed in accordance with CEQA and any local environmental regulations.
8. This comment suggests that future development of identified housing sites could result in erosion and siltation that could impair streams. The comment refers to Housing Element Figure IV-3 which identifies sites in the Housing Element sites inventory. However, all of the sites identified on Figure IV-3 are existing vacant undeveloped parcels that have development potential in the existing condition. These are identified in the City's Housing Element sites inventory to comply with Regional Housing Needs Assessment (RHNA) requirements, but the adoption of the Housing Element and overlay zone does not change development potential at these sites. As the project would not change the potential for development at these sites, there is no physical impact that would result from the project.

Future development at the sites identified on Figure IV-3 could be developed in the existing condition and development would be subject to the City's General Development Standards (Bradbury Municipal Code Chapter 94) or Hillside Development Standards (Bradbury Municipal Code Chapter 97) which require slope protection and stormwater retention to avoid erosion potential. Additionally, the City's Water Efficient Landscape Ordinance (Bradbury Municipal Code Chapter 121) includes requirements for planting disturbed areas and implementing stormwater management practices to minimize runoff and erosion. Future projects would also be required to adhere to the National Pollutant Discharge Elimination System (NPDES) standards which requires project-specific Best Management Practices (BMPs) to be implemented to control erosion and prevent topsoil from exiting the site. Additionally, future projects would implement General Plan policies including (but not limited to) the protection of water bodies, watershed, and courses from development impacts (Conservation Policy 1).

As stated throughout the MND, "The HEU is a policy document, and its adoption would not produce environmental impacts. While no actual development is proposed as part of the HEU or Zoning Actions, implementation of the programs contained in the document would accommodate development through regulations supporting SROs, ADUs, and through

application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals.” None of the proposed regulations or policies proposed as part of the Housing Element Update would increase development potential at the vacant undeveloped parcels shown on Figure IV-3 of the Housing Element Update compared to the existing condition. Therefore, the project would not result in physical impacts at these sites and no impacts to any rivers, streams, or other CDFW regulated resources would occur.

All future development would be required to adhere to the City’s regulations relating to environmental resource protection and General Plan policies including the conservation of riparian vegetation (Conservation Policy 6). Future projects would be evaluated independently under CEQA as applicable, including a project-level evaluation of sensitive biological and botanical resources (Bradbury Municipal Code Section 9.94.030).

Furthermore, the City Hall site does not support riparian habitat as there are no streams on or near the property. The application of the housing overlay on the City Hall site for low-income housing is the only proposed action that would change development potential in the City. Therefore, the project would have no impact to streams or riparian habitats.

9. This comment summarizes the CDFW permit authority pursuant to the California Fish and Game Code Section 1602 Streambed Alteration. As discussed throughout the Draft MND, the project does not identify, describe, promote, entitle, or permit any particular residential development project. Rather, the project is the adoption of the City’s Housing Element and associated Zoning Amendment and does not include any development plans or project-level proposals that could result in environmental impacts. Future development on vacant parcels would be evaluated independently under CEQA, including a project-level evaluation of sensitive biological and botanical resources (Bradbury Municipal Code Section 9.94.030). If required, future development would be subject to CDFW review and application for permits consistent with the resources potentially affected by the development plans. At that time appropriate mitigation measures would be determined. As the adoption of the Housing Element Update would not change the potential for development at vacant sites with potential jurisdictional resources, no impact to CDFW jurisdictional resources would result from project implementation.

The proposed project only changes development potential on the City Hall site through application of the housing overlay. No CDFW jurisdictional resources are present on or near the City Hall site, therefore, the project would have no potential to affect jurisdictional resources and a 1602 permit would not be required for development of that site.

10. This comment recommends mitigation measures for impacts to jurisdictional waters and wetlands. However, as detailed in response #9, adoption of the Housing Element and Zoning Update would not change the potential for development at vacant sites with potential jurisdictional resources; therefore, no impact to CDFW jurisdictional resources would result from project implementation. However, the City agrees that future

development with the potential to impact jurisdictional resources would need to prepare a jurisdictional delineation, impacts assessment, and identify feasible mitigation. While it is feasible that the suggested measures could apply to future development, the project includes the adoption of the City's Housing Element and associated Zoning Amendment which would not change development potential on vacant undeveloped parcels. Should future development be proposed, CDFW would have an opportunity to review and make recommendations for mitigation.

The proposed project only changes development potential on the City Hall site through application of the housing overlay. No CDFW jurisdictional resources are present on or near the City Hall site, therefore, the project would have no potential to affect wetlands and a 1602 permit would not be required for development of that site.

11. This comment recommends the Draft MND require future projects to specifically analyze biological effects of potential changes in hydrology and hydraulics associated with project development. The Draft MND does state that future development would be required to adhere to all applicable City regulations including compliance with the grading and drainage standards adopted by the City (Bradbury Municipal Code Section 9.94.040), on-site retention of stormwater and ensure that grading does not increase, concentrate or divert drainage across lot lines (Bradbury Municipal Code Section 9.94.060). The inclusion of these requirements as regulatory compliance precludes the need to include these recommendations in the Draft MND. Therefore, upon application of a specific development project, site-specific studies, including hydrology and hydraulics would be required to ensure project implementation of City regulations and ensure storm water runoff is controlled in a manner that would minimize environmental effects, including downstream biology. Refer also to responses 9 and 10.
12. This comment focuses on the potential for impacts to nesting birds during construction activities. As detailed in response #4, the removal of trees is not anticipated to allow development at the City Hall site. Furthermore, the project is primarily adoption of a policy document, and no development is proposed. However, throughout the City, in the event any tree removal, trimming or tree disturbance is proposed to implement housing, those actions would be subject to compliance with Fish and Game Code, Sections 3503, 3503.5, 3505, and 3513, and California Code of Regulation, Title 14, Sections 251.1, 652 and 783-786.6 which protects raptors and nesting birds. Additionally, the Migratory Bird Treaty Act (MBTA) prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service. Furthermore, development throughout the City is subject to the City's Tree Preservation and Protection Ordinance which would limit, if not preclude, the removal of trees with nesting bird potential. Therefore, through regulatory compliance future projects would not result in the loss of occupied habitat or reductions in sensitive bird species.
13. This comment recommends mitigation measures for impacts to nesting birds. While it is feasible that the suggested measures could apply to future development, the project

includes the adoption of the City's Housing Element and associated Zoning Amendment which are policy documents. The project does not propose any development at this time, but considers potential future development at the City Hall site. As discussed herein and throughout the MND, development at the City Hall site would occur on existing developed lands, avoiding impacts to sensitive plants or wildlife. Additionally, as detailed in responses 11 and 12 and throughout these responses, there are state, federal, and City regulations which require protections for nesting birds.

14. This comment suggests the need for site-specific biological surveys. As detailed in responses 7, 8 and 9, the project does not propose any physical development at this time. Development at the City Hall site is considered more specifically because of the application of the Housing Overlay which would incentivize development there; this is the only site at which there is a proposed change in development potential. However, the development would be limited to existing disturbed/developed areas of the site and would avoid sensitive biological resources, negating the obligation to require a biological resources survey. Any work related to the on-site oak trees would be handled consistent with the City's Tree Preservation and Protection Ordinance. Furthermore, development of housing citywide would be subject to the City of Bradbury applicable ordinances and development permit procedures of Title IX, Part IV, Section 9.28.060 Environmental Assessment, which requires all projects as defined by CEQA to be reviewed and processed in accordance with CEQA and any local environmental regulations.
15. This comment recommends mitigation measures for general biological impacts. As detailed throughout the MND and these responses, the project is not associated with any significant impacts to biological resources; therefore, no mitigation is required.
16. As detailed in Section 5.0, the City has indicated that payment of Fish and Game fees would be provided upon filing the Notice of Determination. While all biological resource impacts are determined to be less than significant, the City understands the high bar for obtaining a No Effect Determination; therefore, the fee will be paid. This is not a comment on the adequacy of the environmental document.
17. Conclusion paragraph is noted. The City will notify CDFW of future hearings and responses to comments.

Attachment 1: CDFW Comment letter with Numbering

ATTACHMENT 1



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
 CHARLTON H. BONHAM, Director



March 24, 2023

Kevin Kearney
 City of Bradbury
 600 Winston Ave
 Bradbury, CA 91008
kkearney@cityofbradbury.org

Subject: Comments on the Mitigated Negative Declaration for the City of Bradbury 2021-2029 6th Cycle Housing Element Update and Zoning Amendments Project, SCH # 2023020514, Los Angeles County

Dear Mr. Kearney:

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) for the City of Bradbury 2021-2029 6th Housing Element Update and Zoning Amendments Project (Project) from the City of Bradbury (City). Associated documentation includes the 2021-2029 Housing Element (HEU). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Kevin Kearney
City of Bradbury
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Project Description and Summary

Objective: The proposed Housing Element Update establishes programs, policies, and actions to further the goal of meeting the existing and projected housing needs of all family household levels of the community. It will also provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments. To meet the City's RHNA for lower income households, the City has primarily identified affordable housing opportunities through Accessory Dwelling Units (ADUs) and Single-Room Occupancy (SRO) developments. The City has also identified opportunity for affordable housing development at the City Hall site located at 600 Winston Avenue. The Housing Element includes a program to modify the Affordable Housing Overlay Zone (Chapter 88 of the City's Development Code) to allow for multi-family affordable housing at a density range of 20-35 units per acre, through application of the Overlay Zone to the City Hall site. The Affordable Housing Overlay Zone would be applied to the City Hall site either prior to or concurrent with adoption of the Housing Element. The Affordable Housing Overlay Zone already allows an emergency shelter as an allowable land use. As a result, this Initial Study Checklist includes an evaluation of development of a 18-unit multi-family affordable development, based on development on up to 0.55 acre of the City Hall site at a density of 35 dwelling units per acre and an emergency shelter for up to six persons on the rear parking lot portion of the City Hall site.

Location: The Project would apply to the entire geographic area located within the boundaries of the City of Bradbury, which encompasses 1.9 square miles. The City is located at the base of the San Gabriel Mountains below Angeles National Forest in Los Angeles County. It is bordered on the west by the City of Monrovia, and on the south and east by the City of Duarte.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other recommendations are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Specific Comments

Comment #1: Impacts to Oak Trees and Oak Woodland

Issue: The Project's proposed activity will cause impacts to oak woodlands.

Specific impact: The MND indicates that the Project will accommodate the "application of an Affordable Housing Overlay Zone on the City Hall site that would allow development of up to 18 multi-family residential units and an emergency shelter for six individuals, remove two individual oak trees and encroach upon 10 other oak trees through branch and root pruning."

Why impacts would occur: There is no proposed mitigation for impacts to the oak woodland,

Kevin Kearney
City of Bradbury
Page 3 of 20

#5

including the removal of two trees, the understory associated vegetation, as well as the impacts through the encroachment activity for 10 oak trees. Any impacts to the critical root zone may jeopardize the health and persistence of the trees on site. Without enforceable compensatory mitigation, the Project will impact and result in a net loss of existing oak trees and their future recruitment both temporarily and permanently. As a result, the Project may result in a net loss of oak trees and oak woodlands.

#6

Evidence impacts would be significant: Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Oak woodlands serve several important ecological functions such as protecting soils from erosion and land sliding; regulating water flow in watersheds; and maintaining water quality in streams and rivers. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990). Coast live oak and old-growth oak trees (native oak tree that is greater than 15 inches in diameter) are of importance due to increased biological values and increased temporal loss. Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. CDFW considers oak woodlands a sensitive vegetation community.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Prior to any Project ground-disturbing activities, the City should determine:

#7

- 1) Acres of oak woodlands impacted and density, coverage, and abundance of understory vegetation species impacted by life form (i.e., grass, forb, shrub, subshrub, vine);
- 2) Mitigation ratios if the loss of any oaks are anticipated and total number and/or area of replacement trees and vegetation. The mitigation site should mimic the pre-Project percent basal, canopy, and vegetation cover of oak woodland impacted. Associated understory and early successional native species should be planted and monitored along with trees to achieve viable habitat and adequately compensate for biological functions lost;
- 3) Location of restoration areas and a discussion of the adequacy of the location(s) to serve as mitigation (e.g., would support oak trees/oak woodlands; avoid habitat type conversion);
- 4) Location and assessment of appropriate reference site(s) to inform the appropriate planting rate to recreate the pre-Project function, density, percent basal, canopy, and vegetation cover of oak woodland impacted;
- 5) Scientific [Genus and species (subspecies/variety if applicable)] of all plants being used for restoration;
- 6) Location(s) of propagule source. Propagules should be collected or grown from on-site sources or adjacent areas within the same watershed and should not be purchased from a supplier. Seeds must originate from plants/trees of the same species (i.e., Genus, species, subspecies, and variety) as the species impacted; and
- 7) Species-specific planting methods (i.e., container).

Mitigation Measure #2: CDFW recommends the following measures be taken to protect any oak trees designated to have root systems pruned due to construction activities. These measures should be performed by a certified arborist or under the supervision of a certified arborist and/or qualified restoration professional. The exposed tap root, main roots, and any surface-feeding roots exceeding one inch in diameter should be wrapped in protective

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moistened burlap during the excavation. Work should be done as quickly as possible to expose the roots for as little time as possible and the roots should be reburied with clean fill as soon as is feasible (no longer than a day or so, if possible). The burlap should be kept moist. Roots should be cut with sharpened, clean, disinfected tools (10% bleach solution) with every effort to avoid tearing the root and to avoid tearing the root surface. If a certified arborist or and/or qualified restoration professional determines work is being performed improperly, that individual(s) should stop work and determine the best course of action to avoid any tree damage or mortality before restarting work.

If any root disturbing activities are determined to have caused irreversible impacts that may eventually lead to decreased health or mortality of any oak tree, those activities and potential impacts should be documented immediately. All documentation should be summarized in a report provided to the City. Preserved oak trees that may succumb to impacts should be replaced with oak trees that are of the same species and variety.

Mitigation Measure #3: Placement of fill dirt, staging areas, chemicals, or debris should be away from any oak trees designated to be preserved.

Mitigation Measure #4: The City/Project proponent should work with a certified arborist and/or qualified restoration professional to select the most appropriate location for replacement oak trees. Oak trees should not be planted in areas that may be subject to future ground disturbance work that may impact replacement trees. Locations should have appropriate biological or physical factors required by oak trees to grow and persist where possible.

The City should work with a certified arborist and/or qualified restoration professional to acquire appropriately sized, locally sourced oak trees from a local native plant nursery that implements *Phytophthora*/Clean Nursery Stock protocols. This may reduce the probability of introducing oak trees contaminated with pests, diseases, and pathogens that could spread and infect native oak trees or habitats. A certified arborist and/or qualified restoration professional should inspect and potentially quarantine nursery stock before bringing them into the Project site and supervise the installation/transplanting of the oak trees.

The City should protect and monitor the survivorship of planted oak trees until the trees begin to produce seeds. The City should consult with the certified arborist and/or qualified restoration professional on a long-term maintenance plan to provide protective caging, shading, and irrigation. Oak trees should be protected from trampling, damage, or climbing. The City should also consult with the certified arborist and/or qualified restoration professional if coast live oak trees show symptoms of stress and determine the appropriate response to prevent mortality.

Mitigation Measure #5: The oak woodland restoration site should be monitored and managed for a minimum of 10 years to ensure success of the restoration effort. In addition, trees that have had roots pruned should also be monitored and evaluated to determine any decline in health. If a severe decline in health or mortality is seen in any of these trees, they should be removed and mitigated for.

Comment #2: Impacts to Streams

Issue: Development of potential sites facilitated by the Project could impact streams.

#7 cont.

#8

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#8 cont.

Specific impacts: According to Figure IV-3: Bradbury Sites Inventory in the HEU, several sites identified for housing needs are adjacent to identified streams. Development in these areas may result in erosion and earth movement that could impair streams. These impacts may occur in ephemeral, intermittent, or perennial streams. In addition, vegetation along streams may need to be removed or may be degraded through habitat modification (e.g., loss of water source, encroachment, and edge effects leading to introduction of non-native plants).

Why impacts would occur: According to Figure IV-3 of the HEU, vacant undeveloped parcels have been identified to meet housing needs in the City. At least two of these sites are adjacent to a canal. Development of these sites could affect riparian habitat during project construction and operation. Development on these and potentially other sites may result in ground-disturbing activities and vegetation removal. Ground-disturbing activities and vegetation removal could result in erosion. Siltation or runoff downstream could impair streams and herbaceous vegetation. Herbaceous vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. Therefore, project sites that would impact vegetation adjacent to streams, but not the stream itself, may still impact the stream.

In addition, the MND does not recognize the potential need for Section 1602 Lake and Streambed Alteration Agreement, nor does it prescribe, require, or impose specific actions that would substantially mitigate for impacts on streams and associated natural communities. The MND does not require future development facilitated by the Project to undertake any measures to mitigate for impacts on streams and associated natural communities. As a result, the Project could result in unmitigated impacts.

#9

Evidence impacts would be significant: CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources. The Project may result in significant impacts on streams and associated natural communities if development of sites identified by the Project or future projects would be in close proximity to these resources. Without appropriate mitigation, the Project continues to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on fish and wildlife resources, including rivers, streams, or lakes and associated natural communities identified by CDFW.

#10

Recommended Potentially Feasible Mitigation Measure(s) Required for Future Projects Facilitated by the Housing Element:

Mitigation Measure #6: Project specific analyses should prepare a jurisdictional delineation and impact assessment provided along with the project's biological resources technical studies.

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#10 cont

Mitigation Measure #7: If any river, stream, or lake are present and may be impacted, the project should be required to avoid impacts by implementing appropriate vegetative buffers and/or setbacks adjoining the stream or wetland feature to reduce impacts of the project on these resources.

Mitigation Measure #8: If avoidance is not feasible, the project applicant should be required to notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to obtaining a grading permit. The project applicant should comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. The project applicant should also provide compensatory mitigation at no less than 2:1 for any impacted stream and associated natural community, or at a ratio acceptable to CDFW. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2023a).

Recommendation #1: CDFW recommends the MND require any projects to include an analysis of potential impacts in subsequent CEQA documents on biological resources resulting from any proposed water diversion. At a minimum, the analysis should evaluate a study reach that includes the channel downstream from a project site. The study reach should extend a minimum of one mile downstream or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. The analysis of the study reach should discuss changes in hydrology and hydraulics, including the following:

#11

1. Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.
2. Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year.
3. A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach.
4. An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).

Recommendation #2: CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.

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Comment #3: Impacts to Nesting Birds

Issue: Aerial photography indicates ornamental trees around sites inventoried that may provide habitat for nesting birds.

Specific impacts: Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in trees adjacent to a project site.

Why impact would occur: The MND does not provide any avoidance or minimization measures for nesting birds. Without any protective measures, impacts to nesting birds could result from ground disturbing activities related to housing development. Impacts could result from noise disturbances, increased human activity, increased lighting, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable foraging habitats. Construction during the breeding season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

Evidence impact would be significant: The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under state laws and regulations, including Fish and Game Code sections 3503 and 3503.5.

Recommended Potentially Feasible Mitigation Measure(s) Required for Future Projects Facilitated by the Housing Element:

Mitigation Measure #9: To protect nesting birds that may occur on site or adjacent to the Project boundary, CDFW recommends that no construction occur from February 1 through September 15, as early as January 1 for some raptors.

Mitigation Measure #10: If avoidance during the nesting season is not feasible, a qualified biologist should complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests.

These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

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#13 cont.

Mitigation Measure #11: It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence of a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Comment #4: Biological Review

Issue: The MND does not indicate biological surveys will take place for site development under the HEU.

Specific impacts: Without appropriate biological surveys prior to development of residential areas, there is potential to impact biological resources. This may result in injury or death to unidentified wildlife or plant species as well as permanent impacts to their habitat.

#14

Why impact would occur: Impacts to plant and wildlife species not previously known or identified to be on the Project site or within its vicinity have the possibility to occur. In addition, special status species that may exist on project sites or within its vicinity would go unidentified. Therefore, Project implementation, including grading, vegetation clearing, road construction, and road maintenance, may result in direct mortality, population declines, or local extirpation of sensitive plant and wildlife species that were not previously known or identified. This may result in mortality, reduced reproductive capacity, population declines, or local extirpation of a sensitive or special status plant or wildlife species.

Evidence impact would be significant: Impacts to special status plant or wildlife species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to special status plant or wildlife species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Additionally, plants that have a CNPS California Rare Plant Rank (CRPR) of 1A, 1B, 2A, and 2B are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B meet the definitions of CESA and are eligible for State listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, as they meet the definition of rare or endangered (CEQA Guidelines, § 15380).

Recommended Potentially Feasible Mitigation Measure(s) Required for Future Projects Facilitated by the Housing Element:

#15

Mitigation Measure #12: The City should retain a qualified biologist to prepare Biological Resources Assessments for review and approval by the City and other necessary agencies. The assessment should include biological field survey(s) of the project site to characterize the extent and quality of habitat that would be impacted by development. Surveys shall include

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baseline surveys, protocol-level surveys, and tree inventories to confirm the presence of any special status species within or immediately adjacent to proposed impact areas. Surveys shall be conducted by qualified biologists and/or botanists in accordance with CDFW and/or United States Fish and Wildlife Services survey protocols for target species. Biological Resources Assessments should provide and include the following:

1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the project site should also be addressed. A nine-quadrangle search of CDFW's [California Natural Diversity Database](#) (CNDDDB) should be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2023b);
2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the area of potential effect. The [Manual of California Vegetation](#) (MCV), second edition, should be used to inform this mapping and assessment;
4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) [Online Inventory of Rare and Endangered Plants of California](#) (CNPS 2022) as well as the Calflora's [Information on Wild California Plants](#) database (Calflora 2022);
5. A discussion regarding project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and
6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the project site.

If biological resources are documented on the Project site, the Project proponent should comply with the applicable requirements of the regulatory agencies and should apply mitigation determined through the agency permitting process.

Additional Recommendations

Recommendation #3: Data - CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2023c). This includes all documented occurrences of special status species. The City should ensure the data has been properly submitted, with all data fields applicable filled out, prior to Project ground-disturbing activities. The data entry should also list pending development as a threat and then update this

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cont.

occurrence after impacts have occurred. The City should provide CDFW with confirmation of data submittal.

Recommendation #4: Mitigation and Monitoring Reporting Plan - Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Filing Fees

#16

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Lancaster and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

#17

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

Sincerely,

DocuSigned by:



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For Erinn Wilson-Olgin
Environmental Program Manager I

EC: CDFW
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Ruby Kwan-Davis – Seal Beach – Ruby.Kwan-Davis@wildlife.ca.gov
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Cindy Hailey – San Diego – Cindy.Hailey@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQACommentLetters@wildlife.ca.gov

State Clearinghouse - state.clearinghouse@opr.ca.gov

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References:

- Block, W.M., Morrison, M.M., Verner, J. 1990. Wildlife and oak-woodland interdependency. *Fremontia* 18(3):72-76.
- [CDFWa] California Department of Fish and Wildlife. 2023. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>
- [CDFWb] California Department of Fish and Wildlife. 2023. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDB/Maps-andData#43018408-cnddb-in-bios>
- [CDFWc] California Department of Fish and Wildlife. 2023. Submitting Data to the CNDDb. Available from: <https://wildlife.ca.gov/Data/CNDDB/Submitting-Data>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>
- Calflora. 2022. Information on Wild California Plants. Available from: <https://www.calflora.org/>
- [CNPS] California Native Plant Society, Rare Plant Program. 2022. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.0). Available from: <https://www.rareplants.cnps.org>
- Griffin and Muick. 1990. California Native Oaks: Past and Present. *Fremontia* 18(3): 4-12.
- [MCV]. A Manual of California Vegetation, 2nd ed. (2023) Available from: <https://vegetation.cnps.org/>



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE

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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1- Oak Woodland	<p>Prior to any Project ground-disturbing activities, the City shall determine:</p> <ol style="list-style-type: none"> 1) Acres of oak woodlands impacted and density, coverage, and abundance of understory vegetation species impacted by life form (i.e., grass, forb, shrub, subshrub, vine); 2) Mitigation ratios if the loss of any oaks are anticipated and total number and/or area of replacement trees and vegetation. The mitigation site shall mimic the pre-Project percent basal, canopy, and vegetation cover of oak woodland impacted. Associated understory and early successional native species shall be planted and monitored along with trees to achieve viable habitat and adequately compensate for biological functions lost; 3) Location of restoration areas and a discussion of the adequacy of the location(s) to serve as mitigation (e.g., would support oak trees/oak woodlands; avoid habitat type conversion); 4) Location and assessment of appropriate reference site(s) to inform the appropriate planting rate to recreate the pre-Project function, density, percent basal, canopy, and vegetation cover of oak woodland impacted; 	Prior to Project construction and activities	City of Bradbury/Project Applicant

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	<p>5) Scientific [Genus and species (subspecies/variety if applicable)] of all plants being used for restoration;</p> <p>6) Location(s) of propagule source. Propagules shall be collected or grown from on-site sources or adjacent areas within the same watershed and shall not be purchased from a supplier. Seeds must originate from plants/trees of the same species (i.e., Genus, species, subspecies, and variety) as the species impacted; and</p> <p>7) Species-specific planting methods (i.e., container).</p>		
MM-BIO-2- Oak Woodland	<p>The following measures will be taken to protect any oak trees designated to have root systems pruned due to construction activities. These measures shall be performed by a certified arborist or under the supervision of a certified arborist and/or qualified restoration professional. The exposed tap root, main roots and any surface-feeding roots exceeding one inch in diameter shall be wrapped in protective moistened burlap during the excavation. Work shall be done as quickly as possible to expose the roots for as little time as possible and the roots shall be reburied with clean fill as soon as is feasible (no longer than a day or so, if possible). The burlap shall be kept moist. Roots shall be cut with sharpened, clean, disinfected tools (10% bleach solution) with every effort to avoid tearing the root and to avoid tearing the root surface. If a certified arborist or and/or qualified restoration professional determines work is being performed improperly, that individual(s) shall stop work and determine the best course of action to avoid any tree damage or mortality before restarting work.</p> <p>If any root disturbing activities are determined to have caused irreversible impacts that may eventually lead to decreased health or mortality of any oak tree, those activities and potential impacts shall be documented immediately. All documentation shall be summarized in a report provided to the City. Preserved oak trees that may succumb to impacts shall be replaced with oak trees</p>	<p>Prior to Project construction and activities</p>	<p>City of Bradbury/Project Applicant</p>

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MM-BIO-3-Oak Woodland	Placement of fill dirt, staging areas, chemicals, or debris shall be away from any oak trees designated to be preserved.	Prior to Project construction and activities	City of Bradbury/Project Applicant
MM-BIO-4-Oak Woodland	<p>The City/Project proponent shall work with a certified arborist and/or qualified restoration professional to select the most appropriate location for replacement oak trees. Oak trees shall not be planted in areas that may be subject to future ground disturbance work that may impact replacement trees. Locations shall have appropriate biological or physical factors required by oak trees to grow and persist where possible.</p> <p>The City shall work with a certified arborist and/or qualified restoration professional to acquire appropriately sized, locally sourced oak trees from a local native plant nursery that implements <i>Phytophthora</i>/Clean Nursery Stock protocols. This may reduce the probability of introducing oak trees contaminated with pests, diseases, and pathogens that could spread and infect native oak trees or habitats. A certified arborist and/or qualified restoration professional shall inspect and potentially quarantine nursery stock before bringing them into the Project site and supervise the installation/transplanting of the oak trees.</p> <p>The City shall protect and monitor the survivorship of planted oak trees until the trees begin to produce seeds. The City shall consult with the certified arborist and/or qualified restoration professional on a long-term maintenance plan to provide protective caging, shading, and irrigation. Oak trees shall be protected from trampling, damage, or climbing. The City shall also consult with the certified arborist and/or qualified restoration professional if coast live oak trees show symptoms of stress and determine the appropriate response to prevent mortality.</p>	Prior to Project construction and activities	City of Bradbury/Project Applicant
MM-BIO-5-Oak Woodland	The oak woodland restoration site shall be monitored and managed for a minimum of 10 years to ensure success of the restoration effort. In addition, trees that have had roots pruned	Prior to Project	City of Bradbury/Project Applicant

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	shall also be monitored and evaluated to determine any decline in health. If a severe decline in health or mortality is seen in any of these trees, they shall be removed and mitigated for.	construction and activities	
MM-BIO-6- Impacts to Streams	Project specific analyses shall prepare a jurisdictional delineation and impact assessment provided along with the project's biological resources technical studies.	Prior to Project construction and activities	City of Bradbury/Project Applicant
MM-BIO-7- Impacts to Streams	If any river, stream, or lake are present and may be impacted, the project shall be required to avoid impacts by implementing appropriate vegetative buffers and/or setbacks adjoining the stream or wetland feature to reduce impacts of the project on these resources.	Prior to Project construction and activities	City of Bradbury/Project Applicant
MM-BIO-8- Impacts to Streams	If avoidance is not feasible, the project applicant shall be required to notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to obtaining a grading permit. The project applicant shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. The project applicant shall also provide compensatory mitigation at no less than 2:1 for any impacted stream and associated natural community, or at a ratio acceptable to CDFW. Please visit CDFW's Lake and Streambed Alteration Program webpage for more information (CDFW 2023a).	Prior to Project construction and activities	City of Bradbury/Project Applicant
REC-1-Impacts to Streams	<p>CDFW recommends the MND require any projects to include an analysis of potential impacts in subsequent CEQA documents on biological resources resulting from any proposed water diversion. At a minimum, the analysis should evaluate a study reach that includes the channel downstream from a project site. The study reach should extend a minimum of one mile downstream, or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. The analysis of the study reach should discuss changes in hydrology and hydraulics, including the following:</p> <ol style="list-style-type: none"> 1. Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) 	Prior to Project construction and activities	City of Bradbury/Project Applicant

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	<p>the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.</p> <p>2. Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year.</p> <p>3. A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach.</p> <p>4. An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).</p>		
REC-2- Impacts to Streams	<p>CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands</p>	Prior to Project construction and activities	City of Bradbury/Project Applicant

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	in perpetuity.		
MM-BIO-9- Nesting Birds	To protect nesting birds that may occur on site or adjacent to the Project boundary, CDFW recommends that no construction occur from February 1 through September 15, as early as January 1 for some raptors.	Prior to Project construction and activities	City of Bradbury/Project Applicant
MM-BIO-10- Nesting Birds	<p>If avoidance during the nesting season is not feasible, a qualified biologist shall complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. The Lead Agency shall require surveys be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests.</p> <p>These buffers shall be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p>	Prior to Project construction and activities	City of Bradbury/Project Applicant
MM-BIO-11- Nesting Birds	It shall be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the	Prior to Project construction and activities	City of Bradbury/Project Applicant

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	occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.		
MM-BIO-12-Bio Review	<p>The City shall retain a qualified biologist to prepare Biological Resources Assessments for review and approval by the City and other necessary agencies. The assessment shall include biological field survey(s) of the project site to characterize the extent and quality of habitat that would be impacted by development. Surveys shall include baseline surveys, protocol-level surveys, tree inventories to confirm the presence of any special status species within or immediately adjacent to proposed impact areas. Surveys shall be conducted by qualified biologists and/or botanists in accordance with California Department of Fish and Wildlife and/or United States Fish and Wildlife Services survey protocols for target species. Biological Resources Assessments shall provide and include the following:</p> <ol style="list-style-type: none"> 1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed shall include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the project site shall also be addressed. A nine-quadrangle search of CDFW's California Natural Diversity Database (CNDDB) shall be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2023b); 2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas shall 	Prior to Project construction and activities	City of Bradbury/Project Applicant

Kevin Kearney
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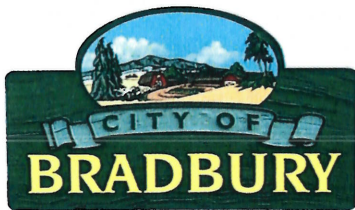
	<p>be included where project construction and activities could lead to direct or indirect impacts off site;</p> <ol style="list-style-type: none"> 3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the area of potential effect. The Manual of California Vegetation (MCV), second edition, shall be used to inform this mapping and assessment; 4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California (CNPS 2022) as well as the Calflora's Information on Wild California Plants database (Calflora 2022); 5. A discussion regarding project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and 6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the project site. <p>If biological resources are documented on the Project site, the Project proponent shall comply with the applicable requirements of the regulatory agencies and shall apply mitigation determined through the agency permitting process."</p>		
REC-4-Data	<p>CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDDB Field Survey Forms (CDFW 2023c). This includes all documented occurrences of special status species. The City should ensure the data has</p>	Prior to Project construction and activities	City of Bradbury/Project Applicant

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	been properly submitted, with all data fields applicable filled out, prior to Project ground-disturbing activities. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The City should provide CDFW with confirmation of data submittal.		
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EXHIBIT C

Mitigation Monitoring and Reporting Program



Mitigation Monitoring and Reporting Program

Prepared for
City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

Prepared by
RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600
San Diego, CA 92108
P 619.308.9333

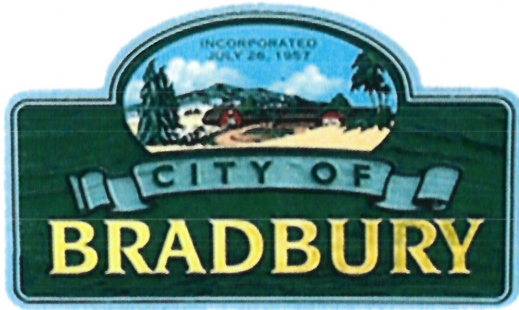
RECON Number 10132

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a mitigation monitoring and reporting program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
CULTURAL RESOURCES/TRIBAL CULTURAL RESOURCES					
MM CUL-1: In order to mitigate potentially significant impacts to buried archaeological features from ground disturbing activities, implementation of a construction monitoring program would be implemented as follows: <ul style="list-style-type: none">• Prior to any ground disturbing activities, the Gabrieleno Band of Mission Indians – Kizh Nation shall be consulted.• An archaeological Principal Investigator and a local Native American monitor will attend a pre-construction meeting prior to ground-disturbing activities. The responsibilities and obligations of the monitors will be reviewed at this meeting.• The Principal Investigator and local Native American monitor will be present during ground-disturbing activities, such as grading and trenching into native soils.• If previously unidentified potentially significant cultural resources are discovered, construction activities should be diverted away from the discovery and the resources should be evaluated for significance. Isolates and non-significant deposits shall be minimally documented in the field. Significant archaeological discoveries include intact features, stratified deposits, previously unknown archaeological sites, and human	Prior to any Ground Disturbance	Notification to Construction Personnel	General Contractor		
	During Construction, If an Archaeological Resource is Discovered	Archaeological Resource Evaluation	Qualified Archaeologist Native American Monitor		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
<p>remains. The Principal Investigator shall inform the City of the discovery and together with the Native American monitor determine its significance. To mitigate potential impacts to significant cultural resources, a Research Design and Data Recovery Program shall be prepared by the Principal Investigator, approved by the City, and implemented using professional archaeological methods. Construction activities would be allowed to resume after the completion of the recovery of an adequate sample and the recordation of features.</p> <ul style="list-style-type: none"> • All cultural material collected during the monitoring and data recovery program shall be processed and curated at Los Angeles County facility that meets federal standards per 36 Code of Federal Regulations Part 79 unless the tribal monitors request the collection. • If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) will be followed. The principal investigator shall contact the County Coroner. • After the completion of the monitoring, the archaeological Principal Investigator shall prepare a report. If no significant cultural resources are discovered, a brief letter shall be prepared. If 					

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
significant cultural resources are discovered, a report with the results of the monitoring and data recovery (including the interpretation of the data within the research context) shall be prepared.					



Darlene Kuba, Chairperson (District 3)
Frank Hernandez, Vice Chairperson (District 1)
Chelsea Halbmam, Commission Member (District 5)
Robert Jones, Commission Member (District 4)
Melodie Szymkowski, Commission Member (District 2)

City of Bradbury Planning Commission Agenda Report

TO: Honorable Chairperson and Commission Members

FROM: Jim Kasama, City Planner

DATE: September 27, 2023

SUBJECT: 2021-2029 (6TH CYCLE) HOUSING ELEMENT

PLANNING COMMISSION RESOLUTION NO. PC 23-316

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF
BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT
AND A DECISION TO RECOMMEND TO THE CITY COUNCIL
APPROVAL AND ADOPTION OF THE REVISED DRAFT 6TH CYCLE
2021-2029 HOUSING ELEMENT**

Attachment

Resolution No. PC 23-316 with Exhibits:

- A) 2021-2029 Housing Element
- B) Housing Element Completeness Checklist

Agenda Item No. 8C

INTRODUCTION

California State law requires every city to have a General Plan that includes a Housing Element that complies with the Government Code. A Housing Element is to identify sites and establish policies to enable a city to accommodate the Regional Housing Needs Assessment (RHNA) allocation to meet the needs of existing and future residents. With reflection on the characteristics of a city, a Housing Element establishes policies that will guide decision making and sets forth programs with quantified objectives. These commitments are required in furtherance of the statewide goal of, “early attainment of decent housing and a suitable living environment for every California family.”

The City retained Veronica Tam and Associates, Inc., and began preparation of the 6th Cycle 2021-2029 Housing Element (the Housing Element Update) in Spring 2021. After a presentation to the City Council, and a Housing Workshop, a Draft Housing Element was made available for public review from April 29 to May 30, 2022, and the Draft was

submitted to the California Department of Housing and Community Development (HCD) for review on June 15, 2022. HCD provided comments on September 1, 2022, and the Revised Draft Housing Element was prepared and made available for public review on February 27, 2023, and sent to HCD on April 6, 2023. HCD sent additional comments, and after meetings with the City Council in July 2023, the Revised Draft Housing Element was further revised in August, posted on the City website, and sent to HCD. See Exhibit A of the attached Planning Commission Resolution No. PC 23-316. Comments are due by October 20, 2023, and they are expected to be minor, if any.

HCD provides a Housing Element Completeness Checklist (Attachment B) to assist cities in preparing a Housing Element that conforms with State Housing Element law. See Exhibit B of the attached Resolution No. PC 23-316. The proposed Housing Element Update has been prepared in accordance with and complies with State law.

PROPOSED HOUSING ELEMENT UPDATE

State Housing Element law requires that each city develop local housing programs that will enable it to meet its fair share of current and future housing needs for all income groups. This fair share is established through the Regional Housing Needs Assessment (RHNA) that is determined by a Council of Governments (SCAG) and allocates a regional share to the various jurisdictions. Table III-1 on Page III-2 of the Housing Element Update presents the following 2021-2029 RHNA allocation for the City of Bradbury:

Income Level	Percent Area Median Income	No. of Units	Percent
Extremely Low	0 – 30%	8	19.5
Very Low	31 – 50%	8	19.5
Low	51 – 80%	9	22
Moderate	81 – 120%	9	22
Above Moderate	>120%	7	17
Total		41	100

Through the public participation and review processes, concern was expressed about the City's ability to accommodate the additional housing because of the unique characteristics of the City. In response to these concerns and in light of the Housing Element requirements, the City amended the provisions for SRO housing by requiring that cooking facilities be included so that they function as adequate living units, and the City will amend the Affordable Housing Overlay zone, and place the Overlay on a portion of the Civic Center to provide an opportunity to develop multi-family affordable housing – see Program 6: Multi-Family Housing on Page VI-6 of the attached Housing Element Update.

The Revised Draft 2021-2029 Housing Element presents and discusses the City's demographics, and the constraints and resources that relate to the production of housing, such as the minimal amount of vacant land, the combination of high land and construction costs, and the significant hazards of wildfires and earthquakes. Despite the constraints, the Housing Element has been prepared to provide for adequate opportunities to meet the City's RHNA allocation. It is expected that this will primarily be through the development of secondary and accessory dwelling units.

For the Housing Element Update, it is required that a specific site in the City be identified and zoned for affordable housing. The Civic Center is the one property that the City has control over, and therefore can be readily designated for affordable housing. In 2018, the Affordable Housing Overlay designation was placed on the entire Civic Center property. It is required that this site be able to accommodate 18 multi-family units and a 6-person emergency shelter. Since City Hall is not likely to be relocated, having the Affordable Housing Overlay designation on the entire Civic Center property is unrealistic. It is to be replaced with a new affordable housing overlay titled Affordable Housing Civic Center Overlay that is to be placed on the rear/easterly 0.68-acre portion of the Civic Center property. An ordinance will create the new Affordable Housing Civic Center Overlay zone and apply it to the rear of the Civic Center site.

ENVIRONMENTAL REVIEW

The City, through Veronica Tam and Associates, Inc., retained Recon Environmental, Inc. to prepare the environmental documentation for the Housing Element Update and related actions. This began with the Initial Study Checklist, and two environmental factors, Cultural Resources and Tribal Cultural Resources were identified as potentially affected, but which would not be significant with mitigation measures. The other topic areas were all of less than significant impact. A Mitigated Negative Declaration was prepared, along with a Mitigation Monitoring and Reporting Program.

Prior to this item, the Planning Commission will have considered the environmental documents and if they are found to be adequate, the Commission will have adopted Resolution No. PC 23-315 to recommend that the City Council adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Housing Element.

FINDINGS

In addition to finding the environmental review and documentation adequate, the following findings are applicable to the Planning Commission decision:

- A. It is necessary to update the City's Housing Element to comply with State law, and the Revised Draft 6th Cycle 2021-2029 Housing Element has been prepared in accordance with State law.
- B. The City has considered the comment letters from HCD and has made changes to the Housing Element in response to those comments.
- C. The Housing Element substantially complies with Housing Element Law as provided in Government Code section 65580 *et seq.*, and contains all provisions required by State Housing Element Law.
- D. The Housing Element is consistent with the other elements of the General Plan, including the Land Use Element which is being updated concurrently.

PLANNING COMMISSION ACTION

The Planning Commission is to open a public hearing and solicit testimony on the Housing Element Update. After the testimony, the Commission is to close the public hearing and determine that the findings can be made to recommend approval of the proposed Housing Element Update and approve a motion to adopt the attached Resolution No. PC 23-316. The Commission's comments and specific recommendations will be transmitted to the City Council with the resolution.

ATTACHMENT

Resolution No. PC 23-316 with Exhibits:

- A) 2021-2029 Housing Element
- B) Housing Element Completeness Checklist

AGENDA ITEM NO. 8C – ATTACHMENT

PLANNING COMMISSION RESOLUTION NO. PC 23-316

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL OF AN AMENDMENT TO THE BRADBURY GENERAL PLAN BY ADOPTING THE REVISED DRAFT 6TH CYCLE 2021-2029 HOUSING ELEMENT

PLANNING COMMISSION RESOLUTION NO. PC 23-316

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL OF AN AMENDMENT TO THE BRADBURY GENERAL PLAN BY ADOPTING THE REVISED DRAFT 6TH CYCLE 2021-2029 HOUSING ELEMENT

WHEREAS, California state law requires every city to have a General Plan, including a Housing Element which complies with the provisions of Government Code section 65580 *et seq.*; and

WHEREAS, the Housing Element is required, among other things, to identify sites sufficient to accommodate the City's Regional Housing Needs Assessment (RHNA) as assigned by the Southern California Association of Governments; and

WHEREAS, the City's final RHNA allocation was a total of 41 housing units broken down among the various income levels as follows: above moderate – 7; moderate – 9; low – 9; and very low – 16; and

WHEREAS, in March 2021, the City retained Veronica Tam and Associates, Inc., for consulting services for the preparation of the Housing Element; and

WHEREAS, the City held a number of meetings on the Housing Element before the City Council, including on February 7, 2022, July 6, 2023, and July 26, 2023; and

WHEREAS, the draft Housing Element and site inventory information was originally posted on the City's website from April 29, 2022 to May 30, 2022 for comment and review; and

WHEREAS, on June 15, 2022, the City sent its draft Housing Element to the Department of Housing and Community Development (HCD) for comment and on September 1, 2022 the City received comments from HCD; and

WHEREAS, a revised draft was posted on the City's website on February 27, 2023 and sent to HCD on April 6, 2023; and

WHEREAS, the City received an additional comment letter from HCD on June 5, 2023; and

WHEREAS, additional revisions to the draft Housing Element were made based on the further comments by HCD; and

WHEREAS, on August 15, 2023, the City posted the revised Housing Element on its website; and

WHEREAS, on August 22, 2023, the City sent the revised Housing Element to HCD; and

WHEREAS, on September 27, 2023 the Planning Commission of the City of Bradbury held a duly noticed public hearing on the Revised 6th Cycle Housing Element, Exhibit A, attached hereto and incorporated herein by reference, in accordance with State law requirements, at which time it took into consideration all evidence presented, both oral and written; and

WHEREAS, prior to adopting this Resolution, the Planning Commission adopted Resolution No. PC 23-315 to recommend that the City Council adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Housing Element;

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF BRADBURY DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. Findings. The Planning Commission of the City of Bradbury does hereby find as follows:

A. The foregoing recitals are true and correct and are incorporated by reference into this action.

B. It is necessary to update the City's Housing Element to comply with State law.

C. The City has considered the comment letters from HCD and has made changes to the Housing Element in response to these comments.

D. The Housing Element substantially complies with Housing Element Law as provided in Government Code section 65580 *et seq.*, and contains all provisions required by State Housing Element Law, as shown in Exhibit B, to this Resolution, which is incorporated herein by reference.

E. The Housing Element is consistent with other elements of the General Plan, including the Land Use Element which is being updated concurrently herewith.

SECTION 2. Recommendation. Based on the above, the Planning Commission hereby recommends that the City Council adopt the 6th Cycle Housing Element for 2021-2029.

SECTION 3. Modification. The Planning Commission hereby finds that there is no need to return this Housing Element to the Planning Commission if non-substantive changes or amendments are made to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by HCD to achieve certification.

SECTION 4. Certification. The City Clerk shall certify to the passage of this Resolution.

SECTION 5. Custodian of Record. Each and every one of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the Project. All summaries

of information in the findings which precede this section are based on the entire record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The documents and materials that constitute the record of proceedings on which these findings and approval are based are located in City Hall. The Custodian of Record is the City Clerk, Diane Jensen who can be reached at (626) 358-3218, or by email at djensen@cityofbradbury.org.

PASSED, APPROVED, AND ADOPTED this 27th day of September, 2023.

Chairperson

ATTEST:

City Clerk

I, Diane Jensen, City Clerk, hereby certify that the foregoing Resolution No. PC 23-316 was duly adopted by the Planning Commission of the City of Bradbury, California, at a regular meeting held on the 27th day of September, 2023, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

EXHIBIT A

2021-2029 Housing Element



2021-2029 Housing Element

Draft June 2022

Revised Draft August 2023

Bradbury City Hall
600 Winston Avenue
Bradbury, CA 91008

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Housing Element 2021-2029

CHAPTER I

INTRODUCTION

A. Purpose

The Housing Element of the Bradbury General Plan identifies and establishes the City's policies with respect to meeting the needs of existing and future residents. It establishes policies that will guide City decision-making and sets forth an action plan including quantified objectives to implement its housing goals over the 2021-2029 Housing Element planning period. These commitments are in furtherance of the statewide housing goal of "early attainment of decent housing and a suitable living environment for every California family," as well as a reflection of the characteristics unique to the City of Bradbury.

B. Public Participation

The City of Bradbury began the Housing Element update process in Spring 2021. An introductory presentation was made before the City Council on April 20, 2021. The meeting provided an overview of the Housing Element requirements and offered the public an opportunity to provide input. In addition to announcing the meeting on the City's website, a special flyer was prepared and sent to agencies and organizations that serve special needs populations in the region, market-rate and affordable housing developers in the region, and agencies/individuals that have provided comments to the City's Housing Element update. The flyer and mailing list are included in Appendix A. During the meeting, the public was concerned about the City's limited potential for additional housing growth. The City conducted a second Housing Workshop on March 7, 2022 to discuss the provisions for single-room occupancy (SRO) units and SRO developments.

In addition, the City has conducted discussions with the City Council on various housing topics:

- March 1, 2021 – Kickoff of Housing Element update and potential challenges
- February 7, 2022 – Re-initiation of the Housing Element update after delays due to staffing constraints

The Draft Housing Element was made available for Public Review from April 29, 2022 to May 30, 2022. The draft was posted in the City's website and stakeholders were notified. A copy of the

notice is found in Appendix A. The Draft was submitted to HCD for review on June 15, 2022. This Revised Draft Housing Element was prepared to respond to HCD's comments (received September 1, 2022). The Revised Draft was available for public review on February 27, 2023 and sent to HCD on April 6, 2023. HCD sent another comment letter and additional revisions were made. These changes were discussed at Special Study Sessions of the City Council on July 6, 2023 and July 26, 2023. The Revised Draft was available for public review on _____ and sent to HCD on _____. Pursuant to SB 1087, the City will provide the adopted Housing Element to its water and sewer service providers.

During the various public meetings, the public has expressed concerns regarding the City's ability to accommodate additional housing given its unique characteristics. In response to these concerns while addressing Housing Element requirements, the City revised the provisions for SRO housing (to require cooking facilities and therefore can function as an adequate living unit) and will amend the Affordable Housing Overlay to permit multi-family affordable housing development (see Program 5 in the Housing Plan section of this Housing Element).

C. Consistency with State Planning Law and General Plan

The Housing Element is one of the eight General Plan elements mandated by the State of California, as articulated in Chapters 65580 to 65589.8 of the Government Code. State Law requires that the Housing Element consist of "an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement and development of housing." The residential character of the City is, largely, determined by the variety of its housing and the location and maintenance of the housing. The Housing Element represents an effort to provide housing for all economic segments of the population.

The Housing Element of the General Plan is only one facet of a City's planning program. The California Government Code requires that General Plans contain an integrated, consistent set of goals and policies. The Housing Element is, therefore, affected by development policies contained in the Land Use Element, which establishes the location, type, intensity and distribution of land uses throughout the City. The Circulation Element establishes policies for providing essential streets and roadways to all housing that is developed. The policies that are contained in other elements of the General Plan affect the quality of life that citizens expect.

As part of this Housing Element update, the City reviewed the General Plan and its implementing Zoning Code for consistency with this Housing Element update. In September 2022, the City amended the Zoning Code to address the provision of SRO developments. The City will also amend the Zoning Code in 2023 to address to provision of adequate sites for RHNA.

As portions of the General Plan may be amended in the future, the elements of the General Plan, including the Housing Element, will be continuously reviewed to ensure that internal consistency is maintained.

D. Housing Element Planning Period

State law requires that a jurisdiction evaluate its housing element according to a schedule established for each region in the State to determine its effectiveness in achieving City and State housing goals and objectives, and to adopt an updated Housing Element that reflects the results of this evaluation. Pursuant to the update cycle for jurisdictions within the Southern California Association of Governments (SCAG) region, Bradbury's Housing Element update covers the eight-year, 2021-2029 planning period.

E. Housing Element Organization

California Government Code [Section](#) 65583 requires the Housing Element to include the following components:

- A review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as an assessment of the overall effectiveness of the Housing Element.
- An assessment of housing needs and an inventory of resources and constraints related to meeting these needs.
- A statement of community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement and development of housing.
- A program which sets forth an eight-year schedule of actions that the City is undertaking, or intends to undertake, in implementing the policies set forth in the Housing Element.

The Housing Element is divided into six chapters:

Chapter I provides an overview of the scope and purpose of the Housing Element including a summary of the public participation and consistency with the General Plan;

Chapter II presents the Demographic Characteristics profile which provides an overview of population, employment and housing characteristics in the City;

Chapter III identifies existing and future housing needs, including special needs populations;

Chapter IV examines Housing Constraints and Resources that either facilitate or impede housing development in the City;

Chapter V provides a review of the 2013-2021 Housing Element Performance;

Chapter VI is the community's statement of housing policies and describes the housing programs that will be implemented in order to achieve these goals and policies. This Chapter also contains Bradbury's Quantified Objectives for the Housing Element 2021-2029 planning period.

F. Information Resources

A number of sources were used in preparing the Housing Element update. These include:

- American Community Survey (ACS) 2015-2019 five-year estimates
- Population and housing estimates from the State Department of Finance

- Comprehensive Housing Affordability Strategy (CHAS) prepared by HUD (based on 2014-2018 ACS)
- City records
- City development standards derived from the City’s Municipal Code
- SCAG’s Pre-Certified Local Housing Profiles

The regional housing needs allocation (RHNA) was developed by the Southern California Association of Governments (SCAG). All data related to existing housing and residential building sites was obtained from City records. Information regarding development fees charged by other cities was obtained from their planning departments.

G. The Unique Character of the City of Bradbury

Although many cities can state that they have unique qualities that will shape the future development of that city, the City of Bradbury is clearly distinctive among the other cities in Los Angeles County. The City of Bradbury is located in the foothills of the Angeles National Forest and contains only 1.9 square miles of land area (1,216 acres). Twenty-five percent of the City (approximately 301 acres) is vacant steep hillside that is not easily accessible and devoid of public infrastructure. This environmentally sensitive area contains protected ridgelines and riparian habitat, and consists of seven (7) parcels toward the City’s northern boundary adjacent to the City of Monrovia to the west, the City of Duarte to the east, and the Angeles National Forest to the north. The General Plan Land Use Map identifies this area as Open Space, Privately Owned Undeveloped, having a maximum density of one dwelling unit per five acres.

Virtually the entire City is located in a very high fire hazard severity zone. The natural hazards, the steep topography and environmental sensitivity have a significant impact on the planned land uses and densities. The entire City is planned and zoned for single-family residential development, with a majority of the land area located within gate guarded private estate neighborhoods. The City does not contain any multi-family residential zones or commercially or industrially zoned property, and accommodates multi-family rental housing through single-room occupancy (SRO) developments typically used to house on-site equestrian or agricultural employees. The City provides zoning for 7,500 and 20,000 square foot parcels as well as one-, two-, and five-acre parcels.

The City of Bradbury has not experienced substantial population growth for several decades as it is a primarily built-out community. The lack of vacant parcels of land has limited the City’s ability to build housing for new residents. Future growth is expected to remain relatively low because the number of developable parcels of land is continually diminishing. Nonetheless, the community recognizes that it has a role in providing opportunities to address the City’s “fair share” of regional housing. During this housing element cycle, the City’s Regional Housing Needs Allocation (RHNA) assigned by SCAG is 41 units, in the following income distribution:

- Very Low Income (0-50 percent Area Median Income) – 16 units (39 percent)
- Low Income (51-80 percent Area Median Income) – 9 units (22 percent)
- Moderate Income (81-120 percent Area Median Income) – 9 units (22 percent)
- Above Moderate Income (above 120 percent Area Median Income) – 7 units (17 percent)

A significant portion of the community is located within private gated neighborhoods. The circulation systems within these communities are comprised primarily of narrow private roads that have paved widths of between 15 and 20 feet. The private streets are maintained by the homeowner associations. Water, gas, electric, and telephone utilities are available to all areas of the community with the exception of the approximately 302 acres of vacant steep hillside property located adjacent to the Angeles National Forest. The majority of the existing 400 dwelling units have private septic sewer systems. The lack of public sewers constrains the community's density. Therefore, the City focuses its efforts in meeting the RHNA through the provision of Accessory Dwelling Units (ADUs) and has modified the requirements of SRO housing to address its lower and moderate income housing needs.

Since there is only a minimal amount of vacant land in the City for new residential development, and the combination of land values and construction costs render these potential properties as above market rate properties, future affordable housing needs must be provided primarily through the development of new accessory dwelling units. Natural hazards such as wildfires, earthquakes, earth movement, flooding, and windstorms are significant occurrences that constrain the City's land use and density opportunities. Narrow public and private roads, and marginal fire flows have a direct bearing on the land uses and densities adopted by the community.



Housing Element 2021-2029

CHAPTER II

DEMOGRAPHIC CHARACTERISTICS

A. Population

An accurate assessment of existing and future residents' housing needs in the City of Bradbury forms the basis for establishing program priorities and quantified objectives in the Housing Element. This chapter presents statistical information and analyses of demographic and housing factors that influence the demand for, and availability of, affordable housing. The focus of this chapter is to identify the need for housing according to income level and by special needs groups. Most of the data presented is based on the 2015-2019 American Community Survey (ACS). Other data sources include the U.S. Department of Housing and Urban Development (HUD), and data collected by the City of Bradbury.

According to the 2015-2019 ACS, the population of the City of Bradbury was 833 persons. Of this total, 398 are males (47.8 percent), and 435 (52.2 percent) are females. At the time of incorporation in 1957, the City had 518 residents. In the 53 years between incorporation and the 2015-2019 ACS, the City's population grew by 315 individuals to a total of 833 persons, or an increase of 60.8 percent.

B. Age Distribution

Age distribution is an important characteristic because housing demand within the market is influenced by the housing preferences of various distinct age groups. The 2015-2019 ACS indicated that the median age in the City is 46.2 years. This figure is significantly higher than the Los Angeles County median age of 36.5 years (2015-2019 ACS). Demand for housing that responds to the young adult population (18-34 years) traditionally takes the form of apartments, low to moderate cost condominiums, and smaller single-family units; while middle-age adults (35-64 years) generate a demand for moderate to high cost apartments, condominiums, and larger single-family units. Traditionally, seniors (age 65+) tend to live in older, larger houses that have been the property of their households for extended periods. However, as residents age, they can also generate a demand for low to moderate cost apartments, condominiums, group quarters, and manufactured or mobile homes. Table II-1 shows the age distribution of the City of Bradbury in 2019. As shown, children 17 years and younger comprise approximately 17 percent of Bradbury's population while more than half of the City's residents are age 45 and older (52.7 percent).

**TABLE II-1
POPULATION AGE DISTRIBUTION – 2019**

Age Group	Persons	Percent
Preschool (< 5 years)	50	6.0%
School Age (5-17 years)	95	11.4%
College Age (18-24 years)	61	7.3%
Young Adults (25-44 years)	188	22.6%
Middle Age (45-64 years)	267	32.1%
Senior Citizens (65+ years)	172	20.6
Total	833	100%
Median Age = 46.2 years		
Source: 2015-2019 ACS		

C. Race and Ethnicity

Ethnicity of the population is important to the analysis of housing needs for several reasons. The cultural influences of ethnicity often reflect the preferences for housing type, location of housing, associated services, and household composition. For example, the concept of “extended family” can have implications on the definition of overcrowding and housing conditions.

While the City of Bradbury continues to have a predominately white population (45.1 percent), the 2015-2019 ACS documents 37.5 percent of the residents as Asian/Pacific Islander, and 14.9 percent as Hispanic. The City’s ethnic and racial characteristics are summarized in Table II-2:

**TABLE II-2
RACE AND ETHNICITY – 2019**

Racial/Ethnic Group	Persons	Percent
White	376	45.1%
Asian/Pacific Islander	312	37.5%
Hispanic	124	14.9%
African American	8	1.0%
Other race/two or more races	13	1.0%
Total	833	100%
Source: 2015-2019 ACS		

D. Household Income

Income is the most important factor in determining whether a household or family is able to balance housing costs with basic necessities of life while avoiding housing problems such as cost burden and overcrowding. The income characteristics not only influence the range of housing prices in the community, but also the ability of the population to obtain affordable housing. According to the 2015-2019 ACS, the estimated median income in Bradbury was \$146,250, which was twice the \$72,797 median income of Los Angeles County. This underscores the City's relative affluence compared to the region.

For planning and funding purposes, the California State Department of Housing and Community Development (HCD) has developed the following income categories based on the Area Median Income (AMI) of a metropolitan area (such as Los Angeles County):

- Extremely Low Income: households earning up to 30 percent of the AMI
- Very Low Income: households earning between 31 and 50 percent of the AMI
- Low Income: households earning between 51 percent and 80 percent of the AMI
- Moderate Income: households earning between 81 percent and 120 percent of the AMI
- Above Moderate Income: households earning over 120 percent of the AMI

Combined, the extremely low, very low-, and low-income groups are referred to as lower income.¹

The Census does not collect information on the number of households belonging to each of the income categories described above. However, household income data was tabulated by HUD for 2014-2018 (Table II-3). As shown below, between 2014-2018, approximately 26 percent of the City's households earned lower incomes, while approximately 74 percent earned incomes of moderate or above.

**TABLE II-3
HOUSEHOLD INCOME DISTRIBUTION – 2018**

Income Category	Number of Bradbury Households ²	Percent of Bradbury Households
Extremely Low (0-30% AMI)	25	9%
Very Low (31-50% AMI)	8	3%
Low (51-80% AMI)	35	12%
Moderate and Above (>81 AMI)	220	76%
Total	288	100%
Source: HUD CHAS Data, 2014-2018		

¹ Federal housing and community development programs typically assist households with incomes up to 80 percent of the AMI and use different terminology. For example, the Federal Community Development Block Grant (CDBG) program refers households with incomes between 51 and 80 percent AMI as moderate income (compared to low income based on State definition).

E. Employment Trends

Employment characteristics are important to housing market analysis because employment is directly related to income and the ability to afford housing. In addition, the relationship between the location of housing and the location of employment has an impact upon transportation systems, which can impact the location of affordable housing. The only employment opportunities within the City of Bradbury are those related to agricultural uses, and domestic services and maintenance.

According to the 2015-2019 ACS, there were 426 persons 16 years and older in the labor force. Of this total, 417 were employed and 9 were unemployed. Of all employed persons 16 years and older, the type of employment, by industry, as identified in the 2015-2019 ACS, is shown in the following Table II-4. Given that 20 percent of the City's population are age 65 and older, it can be assumed that a substantial portion of those individuals not employed (not in labor force) were retired. In 2019, the overall unemployment rate was 2.1 percent.

As indicated in Table II-4, residents of Bradbury are employed in a variety of industries. The highest percentage of residents are in the following industries: 25.2 percent are employed in education, health and social services; 19.6 percent of residents are involved in management or professional specialties; 9.8 percent of residents work in manufacturing, 8.9 percent are employed in finance, insurance and real estate; and 7.9 percent are in other services besides public administration. While the Census identifies 15 persons employed in farming, forestry or fishing industries, City business license records identify at least six (6) farms in the City, employing an estimated 13 helpers. Staff observed that these farm workers either live in Accessory Dwelling Units on the property, or in single rooms attached to the house or other accessory buildings.

**TABLE II-4
EMPLOYMENT TRENDS – 2015-2019**

Industry	Number of Persons	Percent
Professional, scientific, management and administrative	82	19.6%
Educational, health and social services	105	25.2%
Finance, insurance, real estate and rental & leasing	37	8.9%
Construction	15	3.6%
Arts, entertainment, recreation, accommodation and food services	15	3.6%
Public Administration	15	3.6%
Retail Trade	19	4.6%
Information	14	3.4%
Wholesale trade	17	4.1%
Manufacturing	41	9.8%
Agriculture, forestry and fisheries & mining	15	3.6%
Transportation, warehousing, and utilities	9	2.2%
Other services (except public administration)	33	7.9%
Total	417	100%
Source: 2015-2019 ACS, Table DP03		

The City does not expect a substantial increase or change in business activity during the Housing Element planning period (2021-2029). The Southern California Association of Governments (SCAG) also projects stable levels of employment in Bradbury, with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy showing no change in the 200 jobs in Bradbury from 2016 to 2045.²

The majority of Bradbury residents work in other parts of the metropolitan Los Angeles area as there are few opportunities outside of service, agricultural, and domestic maintenance employment within the City. The City has no commercial zones or business districts, and therefore it is not a viable location for retail or office/professional businesses. The City's steep topography and lack of infrastructure restricts or precludes traditional commercial and industrial urban land uses. Nearby communities such as Monrovia, Arcadia, and Duarte have boundaries that extend beyond the hillside areas and include freeways and arterial streets that run throughout the San Gabriel valley, allowing these cities to have commercial and industrial employment opportunities. These nearby communities have access to regional transportation and have large commercial and industrial areas that provide opportunities for economic expansion and income growth. The City of Bradbury's primary revenue source is property tax.

F. Household Types

Table II-5 shows the household types in Bradbury. The vast majority (89 percent) of households are families. Of the 241 family households, 174 do not have children under the age of 18 living at home. Singles comprise the remaining 11 percent of households in the City.

**TABLE II-5
HOUSEHOLDS IN BRADBURY – 2019**

Household Type	Number	Percent
Families	241	89%
With Children	(67)	(28%)
Without Children	(174)	(72%)
Singles	29	11%
Total Households	270	100%
Owner-occupied	219	81%
Renter-occupied	51	19%
Total Households	270	100%
Average Household Size	3.09	
Average Owner Household Size	3.26	
Average Renter Household Size	2.33	
Source: 2015-2019 ACS		

² Southern California Association of Governments, Connect SoCal Demographics and Growth Forecast Technical Report, Adopted on September 3, 2020.

Of the City's 270 households, 219 were owner-occupied (81 percent), and 51 units were renter-occupied (19 percent). The City's average overall household size was 3.09 persons per household in 2019. Owner-occupied housing units had an average household size of 3.26 persons per household, which was larger than the 2.33 persons per household of renter-occupied units.

G. Existing Housing Stock in Bradbury

The 2015-2019 ACS identified a total of 385 dwelling units in Bradbury, a 92 percent increase since 200 dwelling units were recorded in 1970. (This does not include 50 units that were reportedly lost in the wildfires of November 1980). As shown in Table II-6, the vast majority (97 percent) of the housing in the City are single-family, detached units.

**TABLE II-6
HOUSING TYPE AND NUMBER OF UNITS – 2019**

Unit Type	Number	Percent
Single-family detached	377	97.9%
Single unit attached	5	1.3%
Multi-family attached units	3	0.8
Total	385	100%
Source: 2015-2019 ACS, City of Bradbury		

Among Bradbury's 385 housing units documented by the 2015-2019 ACS, 115 were unoccupied, which means a 29.9 percent vacancy rate. About 27 percent of these vacant units are for seasonal use, while 24 percent are for sale only or are sold/not occupied yet. Only four percent of Bradbury's vacant units are for rent. The remaining 45 percent of vacant units are classified as "other" by the ACS and include units held for settlement of an estate, held for personal reasons, or held for repairs, among other reasons (see note 1 on Table II-7).

The vacancy rate of 30 percent in Bradbury is abnormally high. Comparatively, the vacancy rate countywide is only 6.4 percent. The vacancy rate in Bradbury was only 12.7 percent in 2010, according to 2006-2010 ACS estimates. The vacancy rate countywide increased only slightly, from 6.1 percent, during the same period. The homeowner vacancy rate in Bradbury, or vacant homes for sale, is 8.9 percent. The rental vacancy rate, or units for rent, is also 8.9 percent according to the 2015-2019 ACS. The City is characterized by a large number of foreign owners who do not occupy, or occupy only sometimes, the property they own. These are often larger estates where the owners have no interest in redevelopment.

TABLE II-7
VACANT UNITS BY TYPE

	#	%
<u>Total:</u>	<u>115</u>	
<u>For rent</u>	<u>5</u>	<u>4.3%</u>
<u>Rented, not occupied</u>	<u>0</u>	<u>0.0%</u>
<u>For sale only</u>	<u>22</u>	<u>19.1%</u>
<u>Sold, not occupied</u>	<u>5</u>	<u>4.3%</u>
<u>For seasonal, recreational, or occasional use</u>	<u>31</u>	<u>27.0%</u>
<u>For migrant workers</u>	<u>0</u>	<u>0.0%</u>
<u>Other vacant¹</u>	<u>52</u>	<u>45.2%</u>
<u>1. Units included in this category are year-round units which were vacant for reasons other than those mentioned above: For example, held for settlement of an estate, held for personal reasons, or held for repairs. Below are the definitions for the other vacant categories presented referenced by ACS: foreclosure, personal/family reasons, legal proceedings, preparing to rent/sell, held for storage of household furniture, needs repairs, currently being repaired/renovated, specific use housing (only used by a specific group of people at one or various times throughout the year), extended absence, abandoned/possibly to be demolished possibly condemned, other write-in/don't know. See: https://www.census.gov/housing/hvs/definitions.pdf</u> <u>Source: 2015-2019 ACS.</u>		

The condition of existing housing stock is determined by its age, quality of original construction, and continued level of maintenance. Favorable housing conditions enhance neighborhood quality, which in turn promotes housing maintenance and improvement. Quality housing stock also correlates with the income and social stability of a neighborhood and the entire community. According to the City of Bradbury Municipal Code, a substandard building is any building or structure in such condition that is defective, unsightly, or in such condition of deterioration or disrepair that it causes, or may be reasonably expected to cause, any diminution of the values of adjacent properties, or to the City as a whole, or its residents, or that interferes with the peaceful use, possession, or enjoyment of such properties, or improvements on such adjacent lots.

Of the 385 dwelling units in Bradbury identified by the 2015-2019 ACS, 229 (59.5 percent) were built prior to 1990 and are now over 30 years old. Of those units, 189 units are over 50 years old. Though units that are at least 30 years old usually need some replacement of systems (roof, plumbing, electrical). The units in Bradbury were custom built and have been well maintained. The 2015-2019 ACS shows that all occupied housing units have complete plumbing facilities and only three units (one percent of occupied housing units) lack complete kitchen facilities.

According to the City's Building Official, the majority of the City's housing stock is in good-to-fair condition, and very few housing units are not in full compliance with the applicable Building and Safety Codes, and related local ordinances. The City estimates that approximately ten percent of the homes built prior to 1970 (50+ years in age) are in need of some level of rehabilitation. This equates to approximately 19 units. No units have been identified as being in need of replacement.

In 2013, the City of Bradbury adopted an ordinance enacting the Mills Act. This is a preservation and rehabilitation incentive program that provides tax relief to designated historic resources within

the community. Homeowners of historic properties are to utilize the tax savings for architectural restoration, and/or upgrades to plumbing, heating, and other essential housing features.

The majority of housing units in the City use private septic systems to handle effluent. In 2021, of the City's 349 parcels, 132 parcels are connected to the sewer system (37.8 percent) and 217 (62.2 percent) are not. The majority of the units connected to sewers are in the south and south-eastern portions of the City.

H. Single Room Occupancy Units and Accessory Dwelling Units

Nearly half of the dwelling units in Bradbury are located on two- to five-acre agricultural estate parcels. These properties often contain secondary living quarters (SLQs) on the same parcel with the main dwelling unit and have been allowed for decades. The SLQs range from a few hundred square feet to 2,500 square feet. The SLQs do not have separate addresses and the utilities are often obtained through the meters installed to service the main dwelling unit. Occupants of these SLQs range from extended family members to individuals engaged in the care and maintenance of the main dwelling, the grounds or the agricultural/equestrian activities on the property. SLQs are often considered as affordable because they can be occupied by individuals and families that qualify as very low and low income households.

The larger estate dwelling units may also contain guest rooms and maid's quarters, usually in the form of single room occupancy (SRO) units. Although these existing SRO facilities usually do not contain complete kitchens, they do provide living and sleeping accommodations for the personnel employed on site.

The City added Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) in accordance with State law, but has not yet received an application for an ADU or JADU. This may be because the City has allowed secondary dwelling units that are the equivalent of ADUs and JADUs for many years.

In September 2022, the City amended the Zoning Code to require SRO units to include plumbing and cooking facilities to function as a dwelling unit under the California Building Code standards. Single SRO units are no longer permitted. Instead, SRO developments of 2 or more units are permitted in all agricultural zones in the City. SRO units are now also permitted to be used as rentals. The maximum SRO unit size has also increased to 300 square feet (increasing from the current 250 square feet). SRO units are the most feasible option to provide affordable accommodation for lower income households (including extremely low income).

The ability of the City to accommodate more conventional types of affordable housing is constrained by a variety of factors. The hillside character of the community does not lend itself to high density zoning or development. Land cost is high, and the community lacks public sewers and public storm drain facilities. Private streets are narrow and semi-improved. Conventional curbs, gutters, and sidewalks are non-existent in the private gated areas. The community is subject to several significant natural hazards such as wildfires, windstorms, earthquakes, and flooding. High density development, mixed use development, and multiple-family development are not generally options available to the City for the provision of affordable housing. However, the City

is amending the Affordable Housing Overlay to allow multi-family affordable housing on the City Hall site.

The City is committed to the continued promotion of secondary living quarters/accessory dwelling unit development. City building permit and code enforcement records were reviewed to identify the existence of second units. In 1994, a survey of second units was conducted with a resulting count of 61 second units. Between 1994 and 2014, 36 additional second units had been approved, bringing the total to 97. Between 2014 and 2021, the City added seven secondary units, bringing the total to 104. The City's goal will be to add at least one ADU/JADU/SRO unit per year over the 2021-2029 planning period. The Constraints chapter of this Housing Element details the Municipal Code changes the City has made to comply with state law and encourage the development of ADUs/JADUs/SROs and other secondary dwelling units.

I. Housing Values

Table II-8 below shows the value of owner-occupied housing units in 2019. Almost all (99.1 percent) of the owner-occupied housing units had values in excess of \$500,000, and 76.7 percent were valued over \$1,000,000. The median home value in Bradbury was \$1,555,900 compared to \$644,100 in Los Angeles County.

TABLE II-8
VALUE OF OWNER-OCCUPIED HOUSING UNITS –2019

Value	Number	Percent
Less than \$50,000	0	0%
\$50,000 - \$99,000	0	0%
\$100,000 - \$149,000	0	0%
\$150,000 - \$199,000	2	0.9%
\$200,000 - \$299,000	0	0%
\$300,000 - \$499,000	0	0%
\$500,000- \$999,999	49	22.4%
\$1,000,000 plus	168	76.7%
Total	219	100%
Source: 2015-2019 ACS, B25075		

Zillow, a real estate website, had five listings for single family home sales in February and March 2022. There were no listings for houses with fewer than five bedrooms for Bradbury. The following is a summary of the listings

- Four listings for five-bedroom homes:
 - Asking prices ranged from \$1,980,000 to \$3,250,000, median square footage was 5,234 square feet.
- One seven-bedroom home was listed for \$11,500,000 and was over 11,000 square feet in size.

By comparison, there were no listings for Monrovia and only one for Duarte for houses with at least five bedrooms. Arcadia had a more robust listing of homes with more than five bedrooms. Combing all listings for homes with five or more bedrooms in Arcadia and Duarte, there were:

- 15 listings for five-bedroom homes
 - Asking price ranges from \$895,000 (Duarte listing) to \$4,990,000, median square footage was 4,693 square feet.
- 16 listings for six-bedroom homes
 - Asking prices ranges from \$1.5 million to \$12 million, median square footage was 7,034 square feet.
- Two listings for seven-bedroom homes
 - Asking price ranges from \$7.3 million to \$8.4 million, median square footage was 10,971 square feet.

Monthly contract rent is listed in the following Table II-9. As indicated previously, the majority (81.1 percent) of the occupied housing units in the City are owner-occupied. Of the total 51 rentals, 48 (94.1 percent) were identified as having "no cash rent," which are likely Accessory Dwelling Units occupied by grooms/animal caretakers, farm workers, and/or domestic employees, and the living accommodations are provided as part of the occupant's compensation.

TABLE II-9
MONTHLY CONTRACT RENT – 2019

Monthly Rent	Number	Percent
Less than \$499	0	0%
\$500 - \$799	0	0%
\$800 - \$999	3	5.9%
No Cash Rent	48	94.1%
Total Rental Occupied Units	51	100%
Source: 2015-2019 AC, S2503		

In March 2022, review of advertised apartments on Zillow near Bradbury in the adjacent cities of Monrovia, Duarte, and Arcadia provide additional information on rental costs.

- Nine one-bedroom apartments were listed for rent with a median rent of \$1,700;
- 16 two-bedroom apartments were listed for rent with a median rent of \$2,273; and
- Nine three-bedroom apartments were listed for rent with a median rent of \$3,300.

Housing Affordability

The costs of home ownership and renting can be compared to a household's ability to pay for housing to determine the affordability of a community. The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey, HCD developed income limits that can be used to determine the maximum price that could be affordable to households in the upper range of their respective income category. Table II-10 illustrates maximum affordable mortgage payments and rents for various household sizes in Los Angeles County earning the top end of their respective income categories.

Given that the median home value in Bradbury was \$1,555,900 in 2019, purchasing a home is only feasible for upper income households. Renting in nearby communities, such as Monrovia and Duarte, may also prove challenging for lower and moderate income households. Comparing the affordable rents in Table II-9 with the median rents from the Zillow website listed above, some lower priced one-bedroom units may be available to low and moderate income households but larger households are priced out of two- and three-bedroom units.

TABLE II-10
LOS ANGELES COUNTY AFFORDABLE HOUSING COST (2020)

	Annual Income Limits	Affordable Monthly Housing Costs	Utilities	Taxes, Ins., HOA (Ownership only)	Affordable Rent	Affordable Home Price
Extremely Low Income (0-30% AMI)						
1-Person (studio)	\$23,700	\$593	\$151	\$207	\$442	\$61,790
2-Person (1 bdrm)	\$27,050	\$676	\$166	\$237	\$510	\$72,096
3-Person (2 bdrm)	\$30,450	\$761	\$190	\$266	\$571	\$80,244
4 Person (3 bdrm)	\$33,800	\$845	\$223	\$296	\$622	\$86,069
5 Person (4 bdrm)	\$36,550	\$914	\$264	\$320	\$650	\$86,953
Very Low Income (31-50% AMI)						
1-Person	\$39,450	\$986	\$151	\$345	\$836	\$129,241
2-Person	\$45,050	\$1,126	\$166	\$394	\$960	\$149,182
3-Person	\$50,700	\$1,268	\$190	\$444	\$1,077	\$166,966
4 Person	\$56,300	\$1,408	\$223	\$493	\$1,185	\$182,427
5 Person	\$60,850	\$1,521	\$264	\$532	\$1,257	\$191,020
Low Income (51-80% AMI)						
1-Person	\$63,100	\$1,578	\$151	\$552	\$1,427	\$230,524
2-Person	\$72,100	\$1,803	\$166	\$631	\$1,637	\$265,026
3-Person	\$81,100	\$2,028	\$190	\$710	\$1,837	\$297,157
4 Person	\$90,100	\$2,253	\$223	\$788	\$2,030	\$327,179
5 Person	\$97,350	\$2,434	\$264	\$852	\$2,170	\$347,334
Moderate Income (81-120% AMI)						
1-Person	\$64,900	\$1,623	\$151	\$568	\$1,472	\$238,233
2-Person	\$74,200	\$1,855	\$166	\$649	\$1,689	\$274,020
3-Person	\$83,500	\$2,088	\$190	\$731	\$1,897	\$307,435
4 Person	\$92,750	\$2,319	\$223	\$812	\$2,096	\$338,527
5 Person	\$100,150	\$2,504	\$264	\$876	\$2,240	\$359,325
Assumptions: 2020 HCD income limits - LA County; LACDA Utility allowance schedule, 2020; VTA and Associates, 2021.						
Based on: 3% interest rate; 30.0% affordable housing cost; 35.0% of monthly affordable cost for taxes and insurance; 10.0% down payment.						



Housing Element 2021-2029

CHAPTER III

HOUSING NEEDS ASSESSMENT

The following analysis of current City housing conditions presents housing needs and concerns relative to various segments of the population. Several factors influence the degree of demand, or "need," for new housing in Bradbury in the coming years. The four major "needs" categories considered in this element include:

- Housing needs resulting from population growth, both in the City and the surrounding region;
- Housing needs resulting from overcrowding;
- Housing needs that occur when households are paying more than 30 percent of their adjusted annual income for housing; and
- Housing requirements for "special needs groups" such as persons with disabilities, the elderly, large families, female-headed households, and the homeless.

A. Regional Housing Needs Assessment

California's Housing Element law requires that each city and county develop local housing programs designed to meet their "fair share" of existing and future housing needs for all income groups. The Regional Housing Needs Assessment (RHNA) is to be determined by the jurisdiction's Council of Governments. This allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for those households who might reasonably be expected to reside within the jurisdiction, particularly lower income households.

The allocation process begins with the State Department of Finance's projection of statewide housing demand for an eight-year planning period, which is then apportioned by the State Department of Housing and Community Development (HCD) among each of the State's official regions. The regions are represented by an agency typically termed a Council of Government (COG). In the six-county Southern California region, which includes the City of Bradbury and all other incorporated cities and unincorporated areas of Los Angeles County, the agency responsible for assigning these is the Southern California Association of Governments (SCAG). Council of

Governments, such as SCAG, then further allocates its assigned regional shares among its member jurisdictions.

Overview of the SCAG Allocation Process – A local jurisdiction's share of regional housing need is the number of additional dwelling units that will need to be constructed in a jurisdiction in order to house the anticipated growth in the number of households, replace expected demolitions and conversions of housing units to non-housing uses, and achieve a future vacancy rate that allows for the healthy functioning of the housing market, over a specified time period. The allocation is provided in four income categories as defined by the State, based upon the relationship to the County (Area) median income (AMI), adjusted for household size:

- Very Low 0-50% of AMI
- Low 51-80% of AMI
- Moderate 81-120% of AMI
- Above Moderate 121% or more of AMI

The allocations are further adjusted to avoid an over concentration of lower income households in any one jurisdiction. The allocation must also consider the existing "deficit" of housing need due to the number of lower income households who are currently paying more than 30 percent of their incomes for housing or living in overcrowded conditions. Table III-1 represents the RHNA for Bradbury for the 2021-2029 planning period.

**TABLE III-1
REGIONAL HOUSING NEEDS ASSESSMENT
2021-2029**

Income Level	Percent AMI*	# of Units	Percent
Extremely Low**	0-30%	8	19.5%
Very Low	31-50%	8	19.5%
Low	51-80%	9	22%
Moderate	81-120%	9	22%
Above Moderate	>120%	7	17.0%
Total		41	100%
Source: SCAG 6 th Cycle Final RHNA Allocation Plan (approved by HCD on 3/22/21). *AMI - Area Median Income **State law requires jurisdictions to also projects housing needs for extremely low income households. SCAG does not differentiate between very low (VLI) and extremely low income (ELI) needs in the RHNA. Pursuant to State law, the City can evenly split the very low income RHNA into very low and extremely low incomes.			

B. Overcrowding

An overcrowded household is typically the result of a shortage of space. Specifically, overcrowding occurs when there are more than 1.01 persons per room (excluding bathrooms, storage areas, and hallways or stairways); and severe overcrowding occurs when there are more than 1.50 persons per room. According to the 2015-2019 ACS, the City of Bradbury has a high number of rooms per household (a median of 7.8 rooms per household) with a comparatively low number of persons per household (3.26 persons for owner occupied units and 2.33 persons for renter-occupied units). This

reflects the City's relative affluence. Among the 270 occupied housing units identified in Bradbury by the 2015-2019 ACS, no owner-occupied units or rental units were overcrowded.

C. Housing Cost Burden

Most households, particularly lower and moderate income households pay for their housing costs out of their wages and income. When a household pays more than 30 percent of its income on housing, it is considered cost burdened. Severe cost burden is paying more than 50 percent of household income for housing. Above moderate income households often pay for their housing costs using assets that are unrelated to wages or employment income.

That said, data from the 2014-2018 ACS and compiled by income category by HUD (referred to as Comprehensive Housing Affordability Strategy or CHAS data) identifies a total of 290 households in Bradbury. Of these, 97 households in Bradbury (33.4 percent) were labeled as cost burdened, with 48 of these households (16.6 percent) spending more than half their income for housing – see the following Table III-2. Specifically, 35.3 percent of homeowners (83 households) were labeled as cost burdened, with 14.5 percent (34 households) being severely burdened. Approximately one-quarter of the City's renter-households were labeled as cost burdened. However, Bradbury has homeowners that are in the top one percent of wealth in the United States. Therefore, the standard measures of affordability exaggerate the “need” of Bradbury residents, who are mostly homeowners.

**TABLE III-2
HOUSING COST BURDEN – 2014-2018**

<u>Households by Income & Cost Burden</u>	<u>Renters</u>	<u>Owners</u>	<u>All Households</u>
<u>Extremely Low (<=30% AMI)</u>	<u>15</u>	<u>10</u>	<u>25</u>
<u>Cost Burden >30</u>	<u>26.7%</u>	<u>100.0%</u>	<u>56.0%</u>
<u>Cost Burden >50</u>	<u>26.7%</u>	<u>100.0%</u>	<u>56.0%</u>
<u>Very Low (>30% to <=50% AMI)</u>	<u>4</u>	<u>4</u>	<u>8</u>
<u>Cost Burden >30</u>	<u>0.0%</u>	<u>100.0%</u>	<u>50.0%</u>
<u>Cost Burden >50</u>	<u>0.0%</u>	<u>100.0%</u>	<u>50.0%</u>
<u>Low (>50 to <=80% AMI)</u>	<u>10</u>	<u>25</u>	<u>35</u>
<u>Cost Burden >30</u>	<u>0.0%</u>	<u>56.0%</u>	<u>40.0%</u>
<u>Cost Burden >50</u>	<u>0.0%</u>	<u>40.0%</u>	<u>28.6%</u>
<u>Mod/Above Mod (>80% AMI)</u>	<u>25</u>	<u>195</u>	<u>220</u>
<u>Cost Burden >30</u>	<u>40.0%</u>	<u>28.2%</u>	<u>29.5%</u>
<u>Cost Burden >50</u>	<u>40.0%</u>	<u>5.1%</u>	<u>9.1%</u>
<u>All Households</u>	<u>55</u>	<u>235</u>	<u>290</u>
<u>Cost Burden >30</u>	<u>25.5%</u>	<u>35.3%</u>	<u>33.4%</u>
<u>Cost Burden >50</u>	<u>100.0%</u>	<u>14.5%</u>	<u>16.6%</u>
<u>Source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 data.</u>			
<u>Note: Severe cost burden is a subset of cost burden. Totals do not add up to 290 due to errors from source.</u>			

Lower Income Cost Burden

For lower income households, cost burden is a housing problem. Of the 74 lower income households in Bradbury, 49 percent face cost burden. Specifically, for lower income renters, cost burden was at 12 percent while cost burden for lower income homeowners was 88 percent. For the City's 31 extremely low income households, 52 percent were facing severe cost burden. However, it is likely that the lower income homeowners are retirees with limited incomes but adequate assets for housing costs. Regarding renters, as described in the Demographics Characteristics chapter, almost all of renters (94 percent) in Bradbury were identified as having "no cash rent", which are likely Accessory Dwelling Units occupied by grooms/animal caretakers, farm workers, and/or domestic employees, and the living accommodations are provided as part of the occupant's compensation. In summary, income alone is not a reasonable gauge by which to determine necessity for housing assistance in this community. Therefore, the City will consider other indicators that might point to need, such as property maintenance changes or outright inquiries about housing assistance.

D. Special Housing Needs

Pursuant to Housing Element Legislation, this Housing Element must include an analysis of special housing needs. The special needs groups include persons with disabilities, the elderly, large families, families with female heads of households, farm workers, and the homeless.

Persons with Disabilities –The 2015-2019 ACS includes data about people with disabilities, including developmental disabilities. The housing needs of people with disabilities vary with the type and severity of the particular disability, and not all people with disabilities require specialized housing consideration. There were 69 people with a disability in Bradbury (Table III-3), which represented 8.3 percent of the City's population. Of the 69 residents, 50 of these were 65 years and older. In Bradbury's labor force, 19 (5 percent) of the 383 employed residents had a disability. There are numerous programs for special education clients and people with disabilities in the San Gabriel/Pomona Valley. Most of these programs are provided through the Los Angeles County Department of Social Services, San Gabriel Valley Region.

**TABLE III-3
DISABILITY AND EMPLOYMENT STATUS**

Status	Number of Persons
Total Employed Persons in Labor Force (Population 16 to 64 years)	383
All Persons with a Disability	69
Persons with Disabilities that are employed	19
Persons with Disabilities that are not employed or not in work force	50
Source: American Community Survey 2015-2019 5-year estimates.	

Disability data also provides valuable context for assessing current and future need for accessible housing units. For example, 84 percent of persons with disabilities have ambulatory difficulties (Table III-4). People with an ambulatory difficulty experience serious difficulty walking or climbing stairs. Persons with an ambulatory difficulty may have unique requirements for accessibility, such

as ramps or elevators. The City's Building Department implements and enforces State codes that require accessibility for people with disabilities. Continued application of the building code requirements will ensure that adequate accessibility is provided for the disabled.

TABLE III-4
DISABILITY BY TYPE

	<u>Number of Persons</u>	<u>% of Persons with a Disability</u>
<u>Total Population with a Disability</u>	<u>69</u>	<u>-</u>
<u>With a hearing difficulty</u>	<u>10</u>	<u>14.5%</u>
<u>With a vision difficulty</u>	<u>13</u>	<u>18.8%</u>
<u>With a cognitive difficulty</u>	<u>20</u>	<u>29.0%</u>
<u>With an ambulatory difficulty</u>	<u>58</u>	<u>84.1%</u>
<u>With a self-care difficulty</u>	<u>29</u>	<u>42.0%</u>
<u>With an independent living difficulty</u>	<u>24</u>	<u>34.8%</u>
Source: American Community Survey 2015-2019 5-year estimates.		

The other two most common disability types reported among persons with disabilities were self-care difficulties (42 percent) and independent-living difficulties (35 percent). People with a self-care difficulty encounter challenges in performing activities of daily living (ADLs), such as dressing or bathing. Depending on the severity of the disability, people with a self-care difficulty may require additional assistance in the home to conduct daily activities. People with independent-living difficulties also require assistance to perform instrumental activities of daily living (IADLs) like grocery shopping or visiting a doctor's office. People with these types of disabilities require home care services and transportation and task assistance services.

While there are no adult licensed community care facilities within the City of Bradbury, the Royal Oaks Assisted Living Community is located in Duarte immediately adjacent to the City. The facility has three levels of care; independent, assisted, and a 48-bed skilled nursing unit. In addition, the Los Angeles County Department of Social Services, San Gabriel Valley Region offers many housing programs that are available to the elderly in the region. Also, Meals-on-Wheels is offered through a program at the Duarte Senior Center on Huntington Drive, and at the Monrovia Senior Neighborhood Center on Foothill Boulevard. Arrangements can be made with Meals-on-Wheels to deliver meals.

Developmental Disabilities – Due to the dramatic rise in autism spectrum disorders (ASD), the California legislature in 2010, passed SB 812, which requires the Housing Element to specifically analyze the housing needs of persons with developmental disabilities, and to identify resources available to serve this population. The State Department of Developmental Services (DDS) currently provides community-based services to 6,000 adults diagnosed with ASD. And, over 4,000 California teenagers diagnosed with ASD will reach adulthood over the next five years, many of whom will want to live independently and need appropriate housing.

The San Gabriel/ Pomona Regional Center (SGPRC) is among 21 regional centers operated by the State DDS to serve the developmentally disabled population. The goal of these centers is to: 1) prevent/minimize institutionalization of developmentally disabled persons and their dislocation from family and community; and 2) enable this population to lead more independent and productive lives. The DDS publishes a quarterly report by age group and residence type. Due to Bradbury's small population, the only data available shows that the SGPRC served between one and ten residents from the 91008 ZIP code between October to December 2021.

The regional centers have identified a number of community-based housing types appropriate for persons living with a developmental disability: Licensed community care facilities and group homes; supervised apartment settings with support services; SB 962 homes (for persons with special health care and intensive support needs); and rent subsidized homes and Section 8 rental vouchers for persons able to live more independently.

Bradbury supports the provision of housing for persons with disabilities, and has adopted provisions in its Development Code to allow supportive housing consistent with other residential uses, and to explicitly provide for community care facilities. The City has also codified procedures to ensure reasonable accommodation for persons with disabilities. Housing Element programs to facilitate affordable housing can also assist residents with developmental disabilities.

Elderly – The 2015-2019 ACS indicate that in 2019, 172 persons (20.6 percent) of the City's population of 833 were 65 years of age or older. An additional 113 persons (13.6 percent) were between 55 and 64 years of age. As mentioned earlier, 50 senior residents had a disability, comprising 29 percent of the population 65 years and older.

The 2015-2019 ACS indicates that there were 55 family households in Bradbury headed by a person over 65; all were owner-households. This represented 20 percent of the City's households. There were 11 elderly residents living alone: eight owners and three renters. Elderly homeowners are subject to increasing utility rates and increased costs for property maintenance. The City recognizes the needs of the elderly, which may include affordability, proximity to services and transportation, and special design features to accommodate physical needs.

The HUD CHAS 2014-2018 data indicates that among the 18 elderly owner-households, four had extremely low incomes and four had low incomes. Four elderly extremely low income owner-households had cost burden for housing. Among the 81 elderly renter-households, four were extremely low income, four were very low income, and eight were low income; all experienced housing cost burden. Bradbury's elderly population, like the rest of the City, is relatively affluent and do not have significant housing problems. The cost burden statistics do not accurately reflect the local situation.

As stated above (under the Persons with Disabilities section), there are no adult community care facilities licensed within the City of Bradbury. However, Royal Oaks is an elder-care facility located adjacent to the City within an unincorporated pocket of Los Angeles County. The facility has three levels of care; independent, assisted, and a 48-bed skilled nursing unit. Los Angeles County Department of Social Services, San Gabriel Valley Region offers many housing programs that are available to the elderly in the region. In addition, Meals-on-Wheels is offered through a program at the Duarte Senior Center on Huntington Drive, and at the Monrovia Senior Neighborhood Center on Foothill Boulevard. Arrangements can be made with Meals-on-Wheels to deliver meals.

Large Family Households – Large families, those with five or more persons, can experience a greater incidence of overcrowding due to the large family size. According to the 2015-2019 ACS, there were 31 large families with five or more people (11.5 percent of all households), of which 28 were owner-occupied, and three were renter-households. Almost 98 percent (377 units) of Bradbury housing stock is detached single family houses. Of the 377 single-family homes, 332 have three or more bedrooms.

Families with Female Heads of Households – Female headed households are more likely to need affordable living accommodations that are near schools, childcare, public transportation, various social services, and employment opportunities. The 2015-2019 ACS identifies 47 female-headed households in Bradbury, representing 17 percent of Bradbury’s total households. Of these 47 households, 22 had children under the age of 18 years old. Specifically, 11 female-headed households were at or below poverty. Programs for families are available nearby in both Duarte and Monrovia.

Farmworker Housing – The majority of the City is zoned for agricultural use of land. The City is comprised of many farms surrounded by urban low density single-family development. According to City business licenses there are six active agricultural businesses with an estimated 13 helpers. This is consistent with the 2015-2019 ACS estimates where 15 employed persons or 3.6 percent of the work force in Bradbury listed farming, forestry or fishing as their occupations. It is assumed that all 15 of these individuals are farm workers since many of the sites of five acres or more the community operate equestrian ranches, and some of the parcels support orchards or groves. The U.S. Department of Labor estimated that mean hourly salary for farmworkers in May 2021 was \$19.51. Assuming farmworkers are hired full time and year round, the annual salary is about \$37,469. This income falls between HCD’s extremely low and very low income limits for 2021. With those low incomes, farmworkers need access to affordable housing.

In Bradbury, most of the working equestrian centers and orchards provide housing (single occupancy rooms, accessory dwelling units, or guesthouses) for the permanent workers employed on site. Staff observed that these farm/ranch workers either live in Accessory Dwelling Units on the property, or in single rooms attached to the house or other accessory buildings. To provide improved accommodation for farm/ranch workers, the City’s new SRO development definition would create independent living units.

Homeless – State legislation (SB2) has mandated that the special needs assessment of the Housing Element include an analysis of the City’s homeless conditions and need for emergency shelter. Homelessness refers to persons and/or families who are without shelter because of economic, disability (physical, mental, substance abuse), and/or domestic circumstances. Such persons may live in vehicles, motels, shelters, and other temporary accommodations. The U.S. Department of Housing and Urban Development (HUD) defines a homeless person as, “an individual who lacks fixed, regular and adequate nighttime residence and an individual who has a nighttime residence that is a public or private nighttime place that is not designated for ordinary use as a regular sleeping accommodation for human beings.”

The Los Angeles Homeless Services Authority (LAHSA) coordinates the biennial Greater Los Angeles¹ Homeless Count, one of the largest homeless count operations in the United States. The count encompasses homeless on the street, in shelters (emergency, transitional and safe haven), and “hidden homeless.” LAHSA’s January 2020 count of the homeless on the street and in shelters identified 66,436 men, women and children, reflecting a 12.7 percent increase above the 2019 count.

While the 2020 Homeless Count does not provide detailed information on why homelessness has increased in the region, the report identifies the following contributing factors:

- Homelessness starts rising when median rents in a region exceed 22 percent of median income and rises even more sharply at 32 percent. In Los Angeles County, the median rent is 46.7 percent nearly half of the median income.
- This is largely due to the lack of affordable housing supply. The Los Angeles region is 509,000 units short of the current demand.
- And systemic racism has led to a disproportionate number of Black people becoming homeless. Black people are 8 percent of the County population and 33.7 percent of people experiencing homelessness.

In the San Gabriel Valley Service Provider Area (SPA-3), the total homeless population increased from the 2019 count of 4,489 to 4,555 in 2020, a 1.5 percent increase. As summarized in the following Table III-5, the number of sheltered homeless in SPA-3 increased by approximately 331 persons between 2019 and 2020, whereas the count identified a decrease of 265 individuals who were unsheltered.

According to LASHA 2020 Homeless Point-in-Time Count, there are no individuals experiencing homelessness in Bradbury. Any homeless people in the City would be served by facilities and programs in the nearby City of Pasadena. These programs include a rotating winter shelter program (provided by the Ecumenical Council of Pasadena Area Churches), several emergency and transitional shelters, and permanent supportive housing. The San Gabriel Valley Consortium on Homelessness maintains an on-line database of services available to the homeless in the San Gabriel Valley (www.sgvc.org). The City of Bradbury periodically provides financial assistance to shelters in the surrounding area that provide housing and assistance to the homeless. Agencies assisted include:

- Union Station Homelessness Services
- Foothill Unity Center
- Friends in Deed

¹ The Greater Los Angeles Homeless Count includes all of Los Angeles County, except the cities of Glendale, Pasadena, and Long Beach, who administer their own counts.

TABLE III-5
2020 AND 2019 LAHSA HOMELESS COUNTS
SPA 3 – SAN GABRIEL VALLEY (EXCLUDING PASADENA)

	2020		2019	
	Number	Percent	Number	Percent
Total SPA 3 Homeless Count	4,555	100%	4,489	100%
Sheltered	1,528	33.5%	1,197	26.7%
Unsheltered	3,027	66.5%	3,292	73.3%
Homeless by Household Type				
Single Adults	3,615	92.7%	3,869	86.2%
Family Members	940	7.3%	616	13.7%
Unaccompanied Youth (<18 years)	0	0%	4	0.1%
Homeless Subpopulations in SPA 3				
Chronically Homeless	1,763	38.7%	1,261	28.1%
Substance Abuse	1,283	28.2%	590	13.1%
Mentally Ill	1,119	24.6%	1,053	23.5%
Veterans	187	4.1%	258	5.7%
Persons with HIV/AIDS	69	1.5%	57	1.3%
Survivors of Domestic Violence	251	5.5%	366	8.2%
Physical Disability	985	21.6%	850	18.9%
Source: 2020 & 2019 Greater Los Angeles Homeless Count www.lahsa.org/homelesscount.asp				
Note: Some people are in more than one subpopulation.				

Extremely Low-Income Households

Housing the extremely-low income population (below 30% of area median income) can be especially challenging. HUD's CHAS dataset provides a wealth of information on such households in Bradbury. According to HUD's 2014-2018 CHAS data, about 11 percent of Bradbury households (31) are considered extremely-low income. About 61 percent of the City's extremely low income households are renters. Table III-6 provides a breakdown of households by income level and tenure. Approximately a third of all renter-households earn extremely low incomes, compared to only five percent of owner-households.

Table III-7 shows the breakdown of housing problems for extremely low income households by household type. About 52 percent of all extremely low income households experience housing problems and cost burdens. Extremely low income elderly households have especially high shares of housing problems with 100 percent of both renter and owner experiencing housing problems and severe cost burdens.

SCAG's Pre-Certified Local Data Profile for the City of Bradbury also provided a breakdown of extremely low income households by race/ethnicity (Table III-8). The race/ethnicity with the highest share of extremely-low income households in Bradbury is Hispanic (29 percent compared to nine percent of total population).

TABLE III-6
HOUSEHOLDS BY INCOME LEVEL AND TENURE

<u>Income Distribution Overview</u>	<u>Renter</u>		<u>Owner</u>		<u>Total</u>	
	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>
<u>Household Income <= 30% HAMFI</u>	<u>19</u>	<u>34.5%</u>	<u>12</u>	<u>5.1%</u>	<u>31</u>	<u>10.7%</u>
<u>Household Income >30% to <=50% HAMFI</u>	<u>4</u>	<u>7.3%</u>	<u>4</u>	<u>1.7%</u>	<u>8</u>	<u>2.8%</u>
<u>Household Income >50% to <=80% HAMFI</u>	<u>10</u>	<u>18.2%</u>	<u>25</u>	<u>10.6%</u>	<u>35</u>	<u>12.1%</u>
<u>Household Income >80%</u>	<u>18</u>	<u>32.7%</u>	<u>200</u>	<u>85.1%</u>	<u>218</u>	<u>75.2%</u>
<u>Total</u>	<u>55</u>	<u>100.0%</u>	<u>235</u>	<u>100.0%</u>	<u>290</u>	<u>100.0%</u>

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Dataset, based on 2014-2018 ACS.

TABLE III-7
HOUSING PROBLEMS AND COST BURDENS OF ELI HOUSEHOLDS BY HOUSEHOLD TYPE

	<u>Renter</u>					<u>Owner</u>					<u>All HH</u>
	<u>Elderly</u>	<u>Small</u>	<u>Lg</u>	<u>Other HH</u>	<u>Total</u>	<u>Elderly</u>	<u>Small</u>	<u>Lg</u>	<u>Other HH</u>	<u>Total</u>	
<u><=30% AMI</u>	<u>4</u>	<u>15</u>	<u>0</u>	<u>0</u>	<u>19</u>	<u>4</u>	<u>4</u>	<u>0</u>	<u>4</u>	<u>12</u>	<u>31</u>
<u>% with any housing problems</u>	<u>100.0%</u>	<u>0.0%</u>	<u>--</u>	<u>--</u>	<u>21.1%</u>	<u>100.0%</u>	<u>100.0%</u>	<u>--</u>	<u>100.0%</u>	<u>100.0%</u>	<u>51.6%</u>
<u>Cost Burden >30%</u>	<u>100.0%</u>	<u>0.0%</u>	<u>--</u>	<u>--</u>	<u>21.1%</u>	<u>100.0%</u>	<u>100.0%</u>	<u>--</u>	<u>100.0%</u>	<u>100.0%</u>	<u>51.6%</u>
<u>Cost Burden >50%</u>	<u>100.0%</u>	<u>0.0%</u>	<u>--</u>	<u>--</u>	<u>21.1%</u>	<u>100.0%</u>	<u>100.0%</u>	<u>--</u>	<u>100.0%</u>	<u>100.0%</u>	<u>51.6%</u>

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Dataset, based on 2014-2018 ACS.

TABLE III-8
ELI HOUSEHOLDS BY RACE

	<u>Total Households</u>	<u>Households below 30% HAMFI</u>	<u>Share below 30% HAMFI</u>
<u>White, non-Hispanic</u>	<u>174</u>	<u>12</u>	<u>6.9%</u>
<u>Black, non-Hispanic</u>	<u>10</u>	<u>0</u>	<u>0.0%</u>
<u>Asian and other, non-Hispanic</u>	<u>98</u>	<u>8</u>	<u>8.2%</u>
<u>Hispanic</u>	<u>28</u>	<u>8</u>	<u>28.6%</u>
<u>TOTAL</u>	<u>310</u>	<u>28</u>	<u>9.0%</u>

Source: HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income. In SCAG's Pre-Certified Local Data Profiles, 2021.

While a third of all renter-households in the City earn extremely low incomes, only 21 percent of these 19 households experience housing problems and cost burdens. Of these 19 ELI households, only four experience housing problems and cost burdens. Those four renter-households are elderly households.

Comparatively, only five percent of all of Bradbury's owner-households (12 households) earn extremely low incomes. All of the City's ELI households experience housing problems. These households are elderly and "other" household types (i.e. not small or large family households). However, extremely low income owner-households in the City, especially elderly owner households, are likely income-poor but asset-rich, given that they own real estate in the City. Housing cost burdens among this segment of the population may not present the same issues compared to extremely low renter-households, although some of the ELI renter-households may also be caretakers who live rent-free on site.

Occasionally as needed, the City provides funding for minor repairs for households with housing problems. Recipients of these grants are primarily elderly households. Bradbury aims to facilitate the rehabilitation of four units during the planning period (see Code Enforcement Program). While there are no existing assisted rental housing projects in Bradbury, the City plans to implement an Affordable Housing Overlay Zone to promote the development of units suitable for lower income households, including ELI households (see Multi-Family Housing Program). The Multi-Family Housing Program also includes an action to facilitate the development of 18 SRO units during the planning period.

E. Units at Risk

The State requires all jurisdictions to include a study of all low and/or moderate income housing units which may at some future time be lost to the affordable inventory due to the expiration of some type of affordability restrictions. The law requires that the analysis and study cover a ten-year period. A review of the information from State and Federal agencies did not identify any assisted rental housing developments with State or Federal contracts. There are also currently no locally assisted rental housing developments in the City of Bradbury. Furthermore, according to the County of Los Angeles Housing Authority, there are no housing units located within the City that receive Section 8 housing assistance, and neither the State, nor the Federal government operate housing assistance programs in the City.



Housing Element 2021-2029

CHAPTER IV

HOUSING CONSTRAINTS & RESOURCES

Local Housing Elements must analyze potential and actual governmental and non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels. The categories of constraints required in the analyses include land use controls, building codes, development processing, infrastructure, environmental, and market conditions.

A. City Development History

The 1.9-square mile City of Bradbury was incorporated in 1957. The City created an enclave for small agricultural uses within a growing metropolitan area. The original agricultural uses were avocado and citrus orchards, along with equestrian ranches. Thoroughbred horses that raced at the nearby Santa Anita Park Thoroughbred Racetrack were housed and trained at these ranches.

When the City incorporated, it included 38 small (7,500 square foot) parcels of land that were developed with single-family residential detached dwelling units of 1,400 to 1,800 square feet of enclosed floor area. The remainder of the City consisted of parcels of land that ranged in size from 20,000 square feet to 12 acres, with a few sites of 20 to 70 acres. Over the years a few subdivisions were recorded that created new home sites that ranged in size from 20,000 square feet to five acres. New single-story, ranch style homes were constructed in the early to mid-1960s with homes of 2,000 to 3,000 square feet. Larger estate dwellings were constructed on the hillside lots. Many of the two- and five-acre parcels also had equestrian facilities. The existing rural equestrian estate development reflects the community's overall character. Additionally, the large lot subdivisions embody the community's desire to protect the sensitive hillside environment.

Over the past 15 to 20 years the City's development trend has been toward large estate mansions of 12,000 to 25,000 square feet in usable floor area. Generally, the estate home sites have also included second dwelling units. The second units have usually been constructed to house elderly family members, or domestic personnel that maintain the property and the animals.

More recently, small and mid-range homes have been purchased and remodeled to add additional bedrooms and second dwelling units. Most of the remodeling has included second story additions. For the most part, the second units appear to be used to accommodate the needs of elderly family members or household maintenance staff.

The City of Bradbury is surrounded by the City of Monrovia to the west, the City of Duarte to the east and south, and the Angeles National Forest to the north. In the center of the City there is a County island that is fully developed with the Royal Oaks Manor, a senior retirement community. Therefore, there is no opportunity for annexation to add land for additional development.

B. Residential Land Use

General Plan and Development Code Land Use Policies

The Land Use Element of the City's General Plan establishes the basic land use policies, development density, and principal single-family residential land use categories for the City. The City's General Plan establishes five (5) single-family residential land use categories comprising 96 percent of the developable land in the City. As part of Bradbury's General Plan 2012-2030 Update, the City reviewed and ratified the land use patterns and development goals of the General Plan that have been in place since 1993. The General Plan establishes a maximum development build-out potential of 497 single-family residential dwelling units within the Bradbury City limits (Land Use Element, page 12). With a current housing stock of about 385 units, the build-out potential is adequate to accommodate the additional housing needs of 41 units as projected by the RHNA (see Chapter III).

The land use designations and intensity of development envisioned by the General Plan are implemented by the City's Development Code (Title IX of the Bradbury Municipal Code). The Code establishes the regulations affecting the uses, density, and size of housing permitted in the different single-family zones of the City which are discussed in further detail later in this Chapter.

Table IV- 1: BRADBURY ZONING DISTRICTS

Zone	Corresponding General Plan Land Use Designation
R-7,500 (Single-Family Residential, 7,500 sq. ft. minimum)	Single-Family Residential 7,500 sq. ft.
R-20,000 (Single-Family Residential, 20,000 sq. ft. minimum)	Single-Family Residential 20,000 sq. ft.
A-1 (Agriculture Residential Estate, one acre minimum)	Estate Residential, one acre
A-2 (Agriculture Residential Estate, two acre minimum)	Estate Residential, two acres
A-5 (Agriculture Residential Estate, five acre minimum)	Estate Residential, five acres
<i>Source: Bradbury Development Code, 2022.</i>	

In addition to the residential zoning districts listed above, the City established an Affordable Housing Overlay Zone in 2010 (Chapter 88 of the Development Code). The Overlay Zone may be assigned to any legally created parcel of land located within the various residential zones provided that such application to the parcel of land complies with the provisions of the California Environmental Quality Act (CEQA); and that such site has adequate access and is provided with acceptable water and sewer or septic service for the intended use. In addition to the land uses permitted in the base zone, emergency shelters, supportive housing, and transitional housing are permitted in the Affordable Housing Overlay Zone. All development standards of the primary zone district apply to development on a parcel with the Overlay Zone designation. However, separate development standards for the Overlay Zone will be proposed to accommodate the lower and moderate income housing needs.

As part of this Housing Element update, the City has included a program to modify the Affordable Housing Overlay Zone to allow for multi-family affordable housing at a density range of 20-35 units per acre, and apply the Overlay Zone to the City Hall site.

Variety of Lot Sizes

The majority of lots in the City are larger lots due to its agrarian history and hilly typography. Large lots do have the opportunity to subdivide. In addition, the City facilitates the infilling of existing lots with additional units, particularly through SRO development. In October 2022, the City amended the Zoning Code to increase the number of units allowed in an SRO Development in the A-1 zone from 3 to 4 units and in the A-2 zone from 5 to 6 units. SRO Developments in the A-5 zone remain at 10 units. This change allows multi-family structures on existing lots without the need for subdivision.

This Housing Plan includes an action to facilitate the subdivision of future large parcels through specific plans to include a range of lot sizes.

Existing Residential Development

Virtually the entire City is single-family residential, with the exception of two large areas designated as Open Space. One area is owned by the Los Angeles County Flood Control District and used for flood control purposes. The other area is owned by the Southern California Water District and it is used for a domestic water reservoir. Other publicly owned lands include a one (1) acre parcel, owned by the City and used for City Hall facilities, and a 13-acre site, owned by the Duarte Unified School District. The Royal Oaks Elementary School is located on this site. The site is designated in the City's General Plan for single-family residential land use with a lot size density of 20,000 square feet. If the School District elected to sell the site for development, the potential yield would be approximately 24 single-family dwelling sites. The School District has not indicated that the site is surplus and re-use of the site is not anticipated within this planning period. Of Bradbury's 1,216 total acres, 1,145 acres (94 percent) are designated as residential use and residential roadways.

C. Provision for a Variety of Housing Types

California Housing Element Law requires jurisdictions to ensure the provision of various housing types which serve all economic segments of the community. Table IV- 2 provides a summary of the various housing types permitted in Bradbury's residential zones. The following sections provide further discussion of these housing types.

Table IV- 2: PERMITTED HOUSING TYPES IN RESIDENTIAL ZONES

Housing Type	R-7,500	R-20,000	A-1	A-2	A-5
Single Family Dwelling	P	P	P	P	P
Manufactured Housing / Mobile Homes	P	P	P	P	P
Residential Care Facilities (6 or fewer residents)	P	P	P	P	P
Residential Care Facilities (7 or more residents)	NP	CUP	CUP	CUP	CUP
Supportive Housing	P	P	P	P	P
Transitional Housing	P	P	P	P	P
Accessory Living Quarters ¹	P	P	P	P	P
Accessory Dwelling Units ¹	P	P	P	P	P
SRO Development (2-4 Units)	NP	NP	P	P	P
SRO Development (2-6 Units)	NP	NP	NP	P	P
SRO Development (2-10 Units)	NP	NP	NP	NP	P
P = Permitted CUP = Conditional Use Permit NP = Not Permitted					
Source: Bradbury Development Code, 2022.					
1. Notes: Pursuant to the requirements of BMC Chapter 85.					

Single Family Residences

Single family dwellings are the primary housing type in Bradbury and are permitted in all residential zones. All residential development in Bradbury, including single family residences, are subject to an architectural review process. Depending on the size of the residence (or residential addition), architectural review is approved administratively by the Planning Department or by the Planning Commission in conjunction with a public hearing. The architectural review process is discussed in more detail later in this Chapter.

Mobile Homes and Factory-Built Housing

The State recognizes that manufactured (mobile homes) and factory-built housing can be integral parts of the solution for addressing affordable housing needs. Pursuant to Government Code Section 65852.3, the siting and permit processes for manufactured housing should be regulated in the same manner as a conventional site or stick-built structure, including, but not limited to, building setback standards, side and rear yard requirements, and standards for enclosures. The Bradbury Development Code was amended in April 2010 to explicitly permit manufactured and factory-built housing installed on a permanent foundation within all residential and agricultural zone districts.

Multi-Family Housing

The presence of environmentally sensitive conditions and infrastructure limitations present significant constraints to the development of multi-family residential development in Bradbury. The existing steep hillsides, which constitute over 25 percent of the City, have slopes in excess of fifty percent and do not lend themselves to development. The City has made a commitment to preserving the pristine natural hillside environment, and the prominent ridgelines and riparian habitats are identified as exceptional natural elements worthy of protection. Community residents live in harmony with various wildlife species that include deer and bears. Destruction of the hillsides and rural environment to create building pads for high density development has been considered and rejected by the residents.

The City of Bradbury is serviced by narrow private streets, and most of the City is not serviced by the public sewer system. The flood control system for most of the City is comprised of privately maintained drains and swales. Virtually the entire City is in a Very High Fire Hazard Severity Zone. The residential water system is owned and operated by a private water company and does not provide sufficient volume or pressure to meet the fire flow requirements for high density development.

Though Bradbury has significant land use limitations, the City is committed to providing affordable housing opportunities for lower income households, particularly through Accessory Dwelling Units (ADUs) and Single-Room Occupancy (SRO) units, which are discussed in the following sections.

Accessory Dwelling Units

State provisions regarding accessory dwelling units have undergone significant change in recent years to further encourage and facilitate this type of infill development as a form of affordable housing. Recent changes impose limits on how local jurisdictions can regulate ADUs, including provisions related to development standards, permitting procedures, and fees. In March 2021 the City amended Chapter 85 of the Development Code (Ordinance No. 373) to comply with State law and specifically define the range of ADUs and Accessory Living Quarters permitted in Bradbury. **The City updated Chapter 85 in July 2022 (Ordinance No. 383).**

Chapter 85 permits the following types of accessory dwelling units, compliant with California Government Code Sections 65852.2 and 65852.22:

- **Accessory Dwelling Units (ADUs)** are defined by the Development Code as a dwelling unit of up to 1,000 square feet that is attached, detached, or located within an existing or proposed residential dwelling which provides complete independent living facilities for one or more persons and includes permanent provisions for living, sleeping, eating, cooking and sanitation on the same parcel of land as the primary unit.
- **Junior Accessory Dwelling Units (JADUs)** are defined as an ADU that is no more than 500 square feet in size and contained entirely within an existing or proposed single-family residence. Besides size and location within the primary residence, JADUs differ from ADUs in that they may or may not have separate sanitation facilities. Either the primary residence or the JADU must be owner occupied, or alternatively both the primary unit and

the JADU may be leased to one party with the restriction that further subleasing is prohibited.

- **Enhanced Accessory Dwelling Unit (EADUs)** are defined as an ADU over 1,000 square feet and up to 1,200 square feet. In addition to being larger in size, EADUs are differentiated from ADUs in that they are required to comply with all requirements of the underlying zone, including fire sprinklers and they must provide one additional parking space per unit. Additionally, EADUs are required to undergo the significant architectural review process through a public hearing before the Planning Commission.
- **Fire Zone Accessory Dwelling Units (FZADUs)** are defined as an ADU in the Very High Fire Hazard Severity Zone which complies with City zoning setback requirements and is equipped with fire sprinklers, the requirement of which would otherwise be prohibited by State legislation. Specifically, FZADUs are required to have minimum rear and side yard setbacks of 15 feet as a precaution in high fire risk areas. FZADUs are otherwise subject to the same standards as ADUs.

Bradbury's regulations pertaining to ADUs are compliant with State law and are therefore, not a constraint to their development. The additional setback required of FZADUs developed within the Very High Fire Severity Zone and the requirement for sprinklers are warranted to mitigate fire-associated risks in these areas.

ADUs, FZADUs, and JADUs are permitted in all zones, compliant with state law. Enhanced ADUs are permitted in the R-20,000 zone; however, they require Architectural Review by the Planning Commission.

The City is committed to providing living accommodations for all economic segments of the population and encourages construction of ADUs and other accessory living quarters at every opportunity. Between 2014 and 2021, seven accessory living quarters (or second units) were developed. The City's second units/accessory living quarters most often provide housing for senior family members; however, City staff has found that these units are sometimes used as housing for on-site workers such as housekeepers, grooms, or farm/[ranch](#) workers. In order to further facilitate the development of ADUs, the Housing Element includes a program to provide pre-approved designs for detached ADUs. This would allow residents to skip the plan-check process resulting in a more affordable option.

Accessory Living Quarters

In addition to the various ADU types listed above, Chapter 85 of the Development Code also provides other types of accessory living quarters which are outside of the parameters for ADUs as defined in State law. These accessory living quarters include single room occupancy (SRO) units, SRO developments, guest houses, and bunk houses.² Unlike ADUs, accessory living quarters are

² The City amended the various provisions of Chapter 85 of the Development Code relating to secondary living quarters and ADUs in October 2022. The amendment removed bunk houses as [a housing type because](#) they are similar to the new definition of SRO development under the [new](#) ordinance. Additionally, as an SRO unit is essentially equivalent to a JADU, an attached room will no longer be considered an SRO.

required by the Development Code to comply with the development standards of the applicable zone. Accessory living quarters are limited to one story, though that one story may be a second story and if detached, must be located at least 20 feet from any other building. Parking must be provided at a rate of one space per accessory living quarter. The parking spaces may be uncovered, except that for detached SRO developments they shall be in carports. Properties with accessory living quarters must be owner occupied, whether in the primary residence or in an accessory living quarter.

Development of any accessory living quarter (SRO developments and guest houses) requires neighborhood compatibility review through the Architectural Review process. In addition to the standard findings for Architectural Review, the following findings are required for approval of accessory living quarters:

1. The accessory living quarter(s) will be appropriate to the size and character of the lot on which it will be located, and to the character of the neighborhood.
2. The accessory living quarter(s) will not overload the capacity of the neighborhood to absorb the physical and use impacts of the unit(s) in terms of parking, adequacy of water and sewer services, traffic volumes and flows, emergency evacuation capacity, and utilities consumption.
3. The accessory living quarter(s) will not be materially detrimental to the public health, safety, and general welfare, or to the use, enjoyment, or valuation of property of other persons located in the vicinity.

These findings may not meet the requirements for Objective Development Standards under SB 330. The City will be developing objective standards to facilitate the development of SRO developments.

A brief discussion of each of the accessory living quarter types is included below:

Single Room Occupancy (SRO) Units and SRO Developments

Per the current Bradbury Development Code, SRO units are rooms of between 150 and 250 square feet of floor area with permanent provisions for living and sleeping that is attached to the primary unit or is part of a single-room-occupancy development. An SRO shall not include cooking and eating facilities, but must include sanitation facilities in an adjacent room of up to 50 square feet which include a door, toilet, shower, and sink. Occupancy of SRO units is limited to no more than two people and may only be personnel employed on the property and their family. In urban settings, SRO buildings are often hotel facilities and can provide a valuable form of affordable private housing for lower-income individuals, seniors, and persons with disabilities. In Bradbury, SROs are occupied by individuals providing on-site domestic services. For example, there are several properties in the City with maid's or groom's quarters located in or adjacent to the principal residence. These quarters are generally a single room with a bathroom, with limited or no kitchen facilities. The room is usually part of the compensation for the on-site worker, so no rent is charged.

Prior to October 2022, the Development Code also allowed for SRO Developments in the A-1, A-2, and A-5 zones. As previously defined, SRO Developments were detached accessory structures used primarily for multiple tenancies in two or more SRO units with a shared kitchen, dining room, and laundry facilities. The maximum number of SRO units permitted within an SRO Development is dependent on the zone (see Table IV- 3). In addition to cooking, eating, and sanitation facilities, each development was also required to have a cleaning supply room or utility closet with a wash tub and running water.

SRO Developments were required to have shared kitchen facilities, dining rooms and laundry facilities, whereas kitchen facilities were prohibited in individual SRO units. To facilitate the development of SRO developments as independent living units, the City amended the Development Code in October 2022. As individual SRO units are essentially the same as an ADU and JADU, individual SROs were eliminated as a separate use. Instead, the amended Development Code promotes the creation of SRO developments. The number of units allowed in an SRO Development is increased in the A-1 zone from 3 to 4 and in the A-2 zone from 5 to 6. SRO Developments in the A-5 zone remain at 10 units. Additionally, the SRO requirements were amended to require cooking facilities in SRO units and to increase the allowable unit size to 300 square feet. The City also eliminated the requirement that the SROs be occupied by domestic help.

Guest Houses and Bunk Houses

Guest Houses are living accommodations detached from the primary unit that may include some or all facilities for complete independent living such as permanent provisions for living, sleeping, eating, cooking, bathing and sanitation for guests and visitors of the occupants of the primary dwelling unit. The maximum allowable size for a guest house varies by zone (see Table IV- 3).

Bunk Houses are living accommodations detached from the primary unit and designed to house two or more individuals who are personnel involved with the care and maintenance of the primary unit, or the associated on-site agricultural, equestrian, farming, or other residential activities. Bunk houses include permanent provisions for living, sleeping, and sanitation facilities, and may include facilities for cooking, bathing, and eating. Bunk houses are subject to the same maximum size requirements as guest houses.

The City amended the provisions relating to guest houses to require cooking facilities in addition to sanitation facilities, and eliminated bunk houses as bunk houses do not qualify as dwelling units in order to encourage the development ADU/JADUs that can function as independent living units.

Summary

Table IV- 3 provides a summary of the types of accessory living quarters previously allowed in each zone and the maximum size permitted and the changes that were recently made to complement this Housing Element update. None of these recent changes reduce the intensity of land use below that which was allowed on January 1, 2018.

**Table IV- 3: ACCESSORY LIVING QUARTERS PERMITTED AND
MAXIMUM ALLOWABLE SIZE**

Zoning	2018	2021 – Ord. 373	<u>October 2022</u> Amendments
R -7,500	Main house (1,500 sf min) Attached SRO (250 sf max) 2 nd Dwelling Unit (1,200 sf max)	Main house (1,500 sf min) ADU/FZADU (1,000 sf max) JADU (500 sf max)	Main house (1,500 sf min) ADU/FZADU (1,000 sf max) JADU (500 sf max)
R-20,000	Main house (1,850 sf min) Attached SRO (250 sf max) Guest house or bunk house or 2 nd Dwelling Unit (1,200 sf max)	Main house (1,850 sf min) SRO (250 sf max) ADU/FZADU (1,000 sf max) or EADU(1,200 sf max) JADU (500 sf max)	Main house (1,850 sf min) ADU/FZADU (1,000 sf max) or EADU (1,200 sf max) JADU (500 sf max)
A-1	Main house (2,250 sf min) Attached SRO (250 sf max) Guest house or bunk house or 2 nd Dwelling Unit (1,500 sf max)	Main house (2,250 sf min) SRO (250 sf max) ADU/FZADU (1,000 sf max) JADU (500 sf max) SRO Development (2-3 units – 250 sf each max) or Guest house/Bunk house (1,500 sf max)	Main house (2,250 sf min) ADU/FZADU (1,000) JADU (500) SRO Development (2-4 units – 300 sf each max) or Guest house (1,500 sf max)
A-2	Main house (2,500 sf min) Attached SRO (250 sf max) Guest house or bunk house or 2 nd Dwelling Unit (2,000 sf max)	Main house (2,500 sf min) SRO (250 sf max) ADU/FZADU (1,000 sf max) JADU (500 max) SRO Development (2-5 units – 250 sf each max) or Guest house or Bunk house (2,000 sf max)	Main house (2,500 sf min) ADU/FZADU (1,000) JADU (500) SRO Development (2-6 units – 300 sf each max) or Guest house (2,000 sf max)
A-5	Main house (2,500 sf min)	Main house (2,500 sf min)	Main house (2,500 sf min)

Zoning	2018	2021 – Ord. 373	<u>October 2022</u> Amendments
	Attached SRO (250 sf max) Guest house or bunk house or 2 nd Dwelling Unit (2,500 sf max)	SRO (250 sf max) ADU/FZADU (1,000 sf max) JADU (500 sf max) SRO Development (2-10 units – 250 sf each max) or Guest house or Bunk house (2,500 sf max)	ADU/FZADU (1,000 sf max) JADU (500 sf max) SRO Development (2-10 units – 300 sf each max) or Guest house (2,500 sf max)

Farmworker Housing

Though the 2015-2019 American Community Survey indicated that only 15 persons worked in farming, fishing, or forestry occupations, the City recognizes that there are “hidden” workers that are employed in the agricultural or equestrian operations within Bradbury. Several of the larger estates in the City have agricultural uses or equestrian ranches. The property owner is often employed in another occupation while maintaining the agricultural and/or equestrian uses on the property through the employment of grooms and other personnel. These personnel often live full-time on the property in an accessory living quarter.

As amended in October 2022, the Bradbury Development Code allows several accessory living quarter types that are suitable for farmworkers employed in the community. These include SRO developments, ADUs, and JADUs, as discussed in the previous sections. The recent Development Code amendments consolidated bunk houses with SRO developments. A single SRO unit was removed as a permitted use. Instead, the City encourages the development of ADUs and JADUs.

When a community has a demonstrated need for housing for farmworkers, the Housing Element must ensure that local zoning, development standards, and permitting processes comply with the Employee Housing Act (Health & Safety Code Sections 17021.5-6). This Housing Element includes a program to review its development standards and processing procedures for small employee housing for consistency with the Employee Housing Act and amend the Development Code as appropriate.

Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Lanterman Act) requires the use of property for the care of six or fewer disabled persons to be classified as a residential use under local zoning codes. No local agency can impose stricter zoning or building and safety standards on these homes than is required for any other residential use in the same zone. Due to the unique characteristics of larger (more than six persons) community care facilities, most jurisdictions require a Use Permit to ensure neighborhood compatibility in the location of larger facilities. Review of the California Community Care Licensing Division inventory of adult and elderly residential care facilities identified no residential care facilities in the City of Bradbury as of February 2022.

The Bradbury Development Code includes definitions for small and large residential care facilities consistent with Health and Safety Code Section 1502. Small residential care facilities (six or fewer occupants) are identified as a permitted use in all residential zones, and large residential care facilities (seven or more occupants) are conditionally permitted in the R-20,000, A-1, A-2 and A-5 zone districts.

The findings for approval of a conditional use permit are (Bradbury Municipal Code § 9.49.030):

- (1) That the site for the proposed use is adequate in size, shape, topography and circumstances;
- (2) That the site has sufficient access to streets and highways, adequate in width and pavement type to carry the quantity and quality of traffic generated by the proposed use;
- (3) That there are sufficient utilities and capacity in the utility systems to accommodate the use;
- (4) That there is sufficient parking to accommodate the use;
- (5) That the use meets the requirements of the Development Code; and
- (6) That the proposed use will not have an adverse effect upon the use, enjoyment or valuation of adjacent property or upon the public welfare.

Additionally, a large residential care facility must meet the following additional requirements (§ 9.42.025)

- (1) The use shall be required to obtain a business license in accordance with Title XIII of this Code.
- (2) The Care Facility shall be required to provide one additional parking space on the Property for each employee.
- (3) The Care Facility shall be required to meet the parking requirements of Chapter 9.103 of the Bradbury Development Code, plus provide one additional parking space for each adult resident beyond six adult residents. All parking spaces shall be required to be provided on the property.

This Housing Element includes a program to evaluate the conditions for approval for large residential care facilities to ensure they are objective and provide certainty in outcomes.

Emergency Shelters

SB 2 (2007) requires jurisdictions with an unmet need for emergency shelters to identify a zone(s) where emergency shelters will be allowed as a permitted use without a conditional use or other discretionary permit. The identified zone must have sufficient capacity to accommodate the shelter need, and at a minimum provide capacity for at least one, year-round shelter.

In 2010, the City adopted an Affordable Housing Overlay zoning designation in which emergency shelters are a permitted use. The Overlay designation can be applied to any residentially zoned property in the City, provided that the site has adequate access and is provided with acceptable water and sewer or septic service for the intended use.

Based on past communications between the City and the State Department of Housing and Community Development (HCD), in order to ensure explicit compliance with SB 2 governing by-right zoning for emergency shelters, the City needed to apply the Affordable Housing Overlay (AHO) zone to a specific parcel or parcels. The City determined that the 1.1-acre City Hall site is the most appropriate location for an emergency shelter and affordable housing.

The City Hall property provides sufficient site capacity, with the City Hall building and parking in front occupying 0.41 acre. Additional parking and a pocket park behind City Hall building occupy another 0.13 acre (purple area in Figure IV- 1). Next to the pocket park is another parking area that is 0.55 acre in size (red area in Figure IV- 1). The 0.13-acre portion of the site is identified as appropriate location within the AHO to accommodate a small shelter. Based on new AB 2339 standard of 200 square feet of site area per shelter bed, the 0.13-acre portion is more than adequate to accommodate a small shelter (up to six persons) with space for parking for staff.

The 0.55-acre portion of the site is identified as a potential location for affordable housing. The City does not anticipate disposing of any portions of the AHO site. Should a shelter or an affordable housing project is proposed, the City will pursue ground-leasing of the site.

The underlying A-1 zoning of the parcel does not have any lot coverage or floor area ratio standards that would limit development. As part of the Zoning Code amendment for this Housing Element update, the City will also adjust the 25-foot rear and side yard setback requirements, and other development standards to ensure a buildable area of sufficient size for a small shelter able to house up to six persons in the 0.13-acre portion of the site. The City has amended the Land Use Map to designate the City Hall site with the AHO, as well as continuing to allow the AHO to function as a floating zone on residentially zoned properties. The zoning on the City Hall site will be amended to include the Affordable Housing Overlay concurrent with this Housing Element.

Figure IV- 1: Affordable Housing Overlay- City Hall

AB 139, passed in 2019, requires that permit processing, development, and management standards for emergency shelters must be objective, and facilitate the development of, or conversion to, emergency shelters. In establishing development standards for an emergency shelter, a local jurisdiction has the flexibility to apply written, objective development, and management standards to regulate the following:

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

The Bradbury Development Code contains development and performance standards for emergency shelters within Chapter 88 (Affordable Housing Overlay Zone). Per BMC Section 9.88.030(1),

“the use of a single-family dwelling unit for emergency shelter for homeless persons with minimal supportive services may be approved administratively by the City Manager, provided that occupancy of the emergency shelter is limited to not more than six months by any single individual, and provided that the subject property and facilities meet the following minimal development standards:

- *The site has adequate water and sewer or septic service for the intended use;*
- *The proposed use will not impact the existing or proposed traffic flow;*
- *The emergency shelter shall not be located closer than 300 feet from any other shelter, school, public park, or similar use;*
- *No on-street parking will be required to meet the needs of the use, and operation of the emergency shelter and such parking requirements shall be not less than required by the Code;*
- *Not more than six homeless persons shall reside in the facility at any one time provided that the occupancy does not constitute overcrowding;*
- *No individual shall reside in the emergency shelter for more than 180 consecutive days;*
- *The client intake area shall not exceed 200 square feet;*
- *The facility shall have at least one on-site manager at all times;*
- *The facility shall be equipped with security provisions and lighting;*
- *Client intake may be operated between the hours of 8:00 a.m. and 8:00 p.m. only; and*
- *The subject premises shall be maintained in a neat and orderly manner consistent with the neighborhood as reflected in the City’s public nuisance and property maintenance standards.”*

The City's existing standards for emergency shelters do not comply with AB 139, particularly as they relate to parking, traffic, and proximity to other uses. Therefore, a program has been included in the Housing Element to review and amend the Development Code to ensure compliance with AB 139 as it pertains to emergency shelters.

Low Barrier Navigation Centers

Enacted in 2019, AB 101 defined “Low Barrier Navigation Center” and created provisions related to their development. Per AB 101, a Low Barrier Navigation Center is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Pursuant to AB 101, local jurisdictions are required to make provisions for Low Barrier Navigation Centers

(LBNC) as development by right in mixed use zones and nonresidential zones which permit multifamily uses if the facility meets specified requirements.

The Affordable Housing Overlay allows multi-family housing. The City will amend the overlay to include LBNC as a permitted use.

Transitional and Supportive Housing

In addition to emergency shelter requirements, SB 2 also mandated that transitional and supportive housing are residential uses that shall only be subject to the same standards and requirements as other residential uses of the same type in the same zone.

Below are the Bradbury Development Code definitions for transitional housing and supportive housing:

Transitional housing is defined in Government Code § 65582 and means buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months from the beginning of assistance.

Supportive housing is defined in Government Code § 65582 and means housing with no limit on length of stay, that is occupied by the target population, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community.

For supportive housing, the target population may include low-income persons with mental disabilities, substance abuse issues, HIV/AIDs or other chronic health conditions, or persons whose disabilities originated before the person turned 18 years of age. Social services provided in conjunction with supportive housing typically include assistance designed to meet the needs of the target population in retaining housing, living and working in the community, and/or improving health.

Transitional and supportive housing are identified as permitted uses in all zones where residential uses are permitted (R-7,500, R-20,000, A-1, A-2, & A-5), subject only to those regulations that apply to other residential uses of the same type in the same zone. These 2015 amendments adding transitional and supportive housing to all zones overrides the provisions of the Affordable Housing Overlay zone designation which allows transitional or supportive housing subject to certain requirements. The Housing Element contains a program to delete the inconsistent provisions.

Pursuant to AB 2162, supportive housing developments of up to 50 units are required to be permitted by-right in all zones where multifamily and mixed uses are permitted, if the proposed development meets specified criteria. AB 2162 also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop. Bradbury does not have any commercial, industrial, or mixed-use zones, and the City permits transitional and supportive housing in all residential and agricultural zones. The Affordable Housing Overlay is a residential zone that

allows multi-family housing. The City will amend the overlay to include transitional and supportive housing as a permitted use.

D. Housing for Persons with Disabilities

Persons with disabilities may have particular housing needs related to mobility restrictions or the ability to live independently. Due to these special housing needs, state housing element law requires the Housing Element to include an analysis of the City's regulations, permitting procedures, and building codes to identify any potential constraints to the development of housing for persons with disabilities. In addition to allowing residential care facilities, as previously discussed, the City's Development Code and other processes and procedures were reviewed as detailed below.

Definition of Family

The Bradbury Development Code defines family as follows: "*Family* means group of individuals not necessarily related by blood, marriage, adoption, or guardianship living together in a dwelling unit as a single housekeeping unit under a common housekeeping management plan based on an intentionally structured relationship providing organization and stability." This definition does not constrain housing for persons with disabilities in that it does not include restrictions based on the number of individuals or familial relationships. However, the requirement for "a common housekeeping management plan based on an intentionally structured relationship providing organization and stability" may present ambiguity and is not necessary or enforceable in the Zoning Code. The Housing Element includes a program action to simplify the definition of family by removing this requirement.

Reasonable Accommodations

Chapter 29 of the Development Code contains procedures for disabled persons, or their representatives, to request a reasonable accommodation from the City's zoning laws, building codes, and land use regulations, policies and procedures to allow a disabled person an equal opportunity to enjoy housing equal to that of non-disabled persons. Reasonable accommodations are typically reviewed by the City Manager or designee. However, for reasonable accommodations that are requested in conjunction with a discretionary land use application that requires review by the Planning Commission, the Planning Commission shall also review the reasonable accommodation. There is no fee associated with processing a request for reasonable accommodation and a variance is not required. If a review by the Planning Commission is required, a public hearing will be held within 45 days after the application is deemed complete and a written determination will be provided within 60 days after the public hearing.

The required findings for the approval of a reasonable accommodation request include:

1. The dwelling that is the subject of the request for reasonable accommodation will be occupied by a disabled person;
2. The requested accommodation is necessary to provide a disabled person with an equal opportunity to use and enjoy a dwelling;

3. The requested accommodation will not impose an undue financial or administrative burden on the City, as defined in the fair housing laws; and
4. The requested accommodation will not require a fundamental alteration to the City's zoning or building laws, policies, and/or procedures, as defined in the fair housing laws. In considering whether the accommodation would require such a fundamental alteration, the reviewing authority may consider, among other factors:
 - a. Whether the requested accommodation would fundamentally alter the character of the neighborhood;
 - b. Whether the requested accommodation would result in a substantial increase in traffic or insufficient parking;
 - c. Whether the requested accommodation would substantially undermine any express purpose of either the City's General Plan or an applicable specific plan; and
 - d. Whether the requested accommodation would create an institutionalized environment due to the number of, and distance between, facilities that are similar in nature or operation.

The required findings on compatibility with neighborhood character and traffic impacts may be considered subjective. The City will review and revise the required findings to ensure they are objective and provide certainty in outcomes.

Building Codes

The City enforces the 2022 California Building Code as amended by Los Angeles County in 2020, as discussed in further detail below. As part of the plan review process, Building and Safety ensures compliance with all CBC regulations pertaining to accessibility. Bradbury has adopted no local amendments to the CBC which would serve to constrain the development of housing for persons with disabilities.

E. Building Codes and Enforcement

Most of the City of Bradbury is located within a Very High Fire Hazard Severity Zone as designated by the State of California and adopted by the Los Angeles County Fire Department, which provides by contract, Fire Department services for the City of Bradbury. Therefore, to have the same building and safety codes that are utilized by the Fire Department, the City of Bradbury has adopted the 2020 Los Angeles County versions of the 2022 California Building Code (CBC) and 2022 Green Building Standards Code. State Law does not allow variances from building and safety codes, and therefore, Bradbury cannot reduce construction costs by revising its building code requirements, particularly, as they pertain to health and safety measures applicable to buildings and structures located in a Very High Fire Hazard Severity Zone.

Building codes establish minimum standards for construction that are essential for ensuring protection of the public health, safety, and welfare. All building construction, alterations, demolitions, or repairs to property in Bradbury are subject to the provisions of the California

Building Code (CBC) and the Bradbury Municipal Code. These requirements result in incremental increases in the cost of housing construction, but are necessary to ensure that buildings in Bradbury are structurally sound and safe to occupy.

The City has retained a Code Enforcement Officer to ensure that all buildings are properly maintained. The City's code enforcement efforts are both proactive and reactive (i.e., respectively, the officer routinely patrols the City to locate violations, and responds to complaints). The officer's efforts are designed to obtain compliance first and foremost, using problem solving to eliminate violations. Health and Safety violations are given the highest priority so that human life and property are protected without delay. The enforcement process follows these steps:

- Notice to Correct is mailed;
- Follow-up inspection of property 30 days after Notice to Correct mailed;
- Case is closed if violations no longer exist or upon abatement of violations; and
- If violations continue, the officer follows up with appropriate notices and potential prosecution, depending on the situation.

The City's Code Enforcement Officer receives approximately 20 to 25 complaints each year and generates approximately two to three cases each month. Approximately eight percent of these cases require either abatement or building permits. The officer estimates that approximately two to three dwelling units are rehabilitated due to code enforcement efforts each year. However, no units require replacement.

F. Site Improvement Constraints

Developers of single-family residential property in Bradbury are required to install street improvements and utilities such as water lines, electrical service lines, and gas lines, to service new development in the City. A substantial portion of the City's properties are in two private homeowners associations. Private streets and certain drainage facilities remain the responsibility of the homeowners associations or a Community Service District (CSD). A majority of the City does not have access to public sewers and are reliant on private on-site septic systems.

Construction costs of off-site improvements vary widely, depending on the topography and the extent of the needed public improvements. A rule of thumb is that off-site improvement costs should be estimated for budgetary purposes at about \$250 per lineal foot. However, the City of Bradbury and the homeowners associations do not require the construction of sidewalks or the installation of streetlights on its public/private streets. The majority of the roadways within the City are private streets with at most 20-foot wide roadways. Street lights and sidewalks are not required for new construction. Surface drainage for a large part of the community is accommodated by private drains and swales maintained by the property owners. The minimal off-site improvements required by the City reduce the cost of development. Because the City has nearly reached its build out capacity, few off-site improvements are required. Therefore, the estimate of \$250 per lineal foot may be more than adequate to cover off-site improvement costs.

G. Fees and Other Exactions

Local agencies charge fees to recover the costs of reviewing applications for development as well as impact and development fees which are designed to ensure new projects pay their fair share of funding to public infrastructure and services based on the increased demand created by the project. Development projects in Bradbury are subject to fees charged by the City of Bradbury, the Sanitation Districts of Los Angeles County, and the Duarte Unified School District.

Table IV- 4 provides a comparison of typical planning permit fees for Bradbury and nearby communities. With the exception of applications for a zone change and appeals, Bradbury's fees are lower than fees charged by the other communities surveyed. In Bradbury, zone changes are typically related to large subdivisions and involve extensive project processing, necessitating a larger fee to cover the costs associated with project review.

Table IV- 4: COMPARISON OF PLANNING PROCESSING FEES (2022)

Permit Type	Bradbury	Duarte	Azuza	Monrovia	Los Angeles County
Zone Change	\$14,577	\$4,000	\$5,750	\$5,600	\$15,217
Variance	\$1,634	\$3,000	\$6,097 (\$1,150 for SF)	\$1,950	\$10,215
Use Permit	\$1,634	\$3,000	\$7,147	\$3,200	\$10,215
Appeal	\$2,165	\$250	\$575 (PC)/ \$1,150 (CC)	\$154	Applicant: \$6,939 Applicant (minor) or non- applicant: \$860
Subdivision Tentative Tract Map	\$4,844	\$7,500	\$10,476- \$18,378 (dependent on # of lots)	\$2,317 (+\$170/unit)	Not in comparable format
Sources: City of Bradbury, Planning and Development Fee Schedule, 2013; City of Duarte, Community Development Department Fee Schedule, 2017; City of Azuza, Planning Division Fees, 2021; City of Monrovia, Planning Fees, 2021; County of Los Angeles, Department of Regional Planning Revised Filing Fees, 2021.					

A more extensive list of Bradbury's planning fees is included in Table IV- 5. The current fee schedule was adopted in 2013. As discussed previously, the City's fees are generally lower than surrounding communities and therefore, are not considered to be a development constraint.

Table IV- 5: BRADBURY PLANNING FEES

Permit Type	Fee
Conceptual Plan Review	\$1,233
Architectural Review – Minor	\$1,081
Architectural Review – Significant ¹	\$1,967
Time Extension / Plan Modification	\$1,634
Variance	\$1,634

Conditional Use Permit	\$1,634
Tentative Parcel/Tract Map	\$4,844
Specific Plan	\$13,507
Zone Change / General Plan Amendment	\$14,577
Zone Code Amendment	\$17,228
Environmental	
Categorical Exemption	\$370
Negative Declaration/Mitigated Negative Declaration	\$1,275/\$1,757
Environmental Impact Report	\$7,500 ²
City of Bradbury, Planning and Development Fee Schedule, 2013.	
Notes:	
1. Includes Neighborhood Compatibility Review	
2. Processing deposit	

Table IV- 6 provides the total fees for a “typical” new single-family residence in Bradbury. As shown, new single residences pay approximately \$26,123 in fees (excluding sewer connection fees).

Table IV- 6: FEES FOR A TYPICAL SINGLE FAMILY RESIDENCE

Fee Type	New Single Family Residence
Planning Fees	
Conceptual Plan Review	\$1,233.94
Architectural Review (Significant)	\$1,967.30
Environmental Review (Categorical Exemption)	\$370.80
Impact Fees and Building Permit Fees	
Building Plan Check	\$6,258.75
Building Permit Fee	\$10,292.31
School Fees (Duarte USD)	\$6,000
Sewer Connection Fee (LAC Sanitation Districts)	Varies
Source: City of Bradbury, Planning Division, 2022.	
Note: Fees are based on the following project assumptions: One-story, 2,000 square feet on an existing flat building area with ready access to all utilities.	

H. Processing and Permit Procedures

The City's Planning Department is responsible for processing applications for development within the City. Planning and zoning applications typically include land divisions, lot line adjustments, conditional use permits, variances, and design review. Many of these projects require significant amounts of staff time for review and analysis, as well as for public hearings. Development plans are reviewed for compliance with planning, building, electrical, mechanical, plumbing, green-building, stormwater, and landscaping codes. The City processes Planning and Building applications in accordance with State Law and within the time frames specified by existing laws, including the Permit Streamlining Act and the California Environmental Quality Act (CEQA).

Time delays associated with the development review and approval process have been cited as a constraint to the development process. Project processing times vary from one project to another and are directly related to the size and complexity of the proposals, as well as the number of applications related to a particular project. Another common delay in processing results from increased development activity and a limited number of staff to process the numerous applications. Table IV- 7 provides typical processing times for common planning permits.

Table IV- 7: TYPICAL PERMIT PROCESSING TIMES

Application Type	Processing Time	Approval Authority
Conceptual Plan Review	2 to 3 weeks	City Planner
Conditional Use Permit	8 weeks	Planning Commission
Variance	8 weeks	Planning Commission
Minor architectural Review	4 weeks	City Planner
Significant Architectural Review	8 weeks	Planning Commission
Tentative Parcel/Tract Map	8 weeks	City Council
Zone Change/Code Amendment/General Plan Amendment	4 months	City Council
Source: City of Bradbury, Planning Division, 2022.		

Development proposals submitted to the City are reviewed for compliance with City regulations and ordinances. Nearly all residential projects in the City require either administrative or Planning Commission Architectural Review. However, ADUs, JADUs, and FZADUs are exempt from any architectural review process. The architectural review process is described in greater detail below. Approval of the architectural review allows the developer/owner to submit building construction plans. These plans are forwarded to a private consulting firm that provides plan check services to the City with a streamlining goal of 21 days for review. Approval of building plans is followed by issuance of City building permits. Applicants may elect to submit plans to the building department simultaneously with the planning review in order to shorten the review process from 60 days to 30 days. Projects that require environmental review will have lengthened review times of an additional six months or more depending on what type of environmental document is needed.

Architectural Review

Pursuant to Chapter 34 of the Development Code, architectural review is intended to:

1. Establish functional adequacy for grading, drainage, utility landscaping and other aspects of each development;
2. Ensure functional interrelationship of buildings, structures and improvements on each development;
3. Preserve trees, ridgeline vistas, canyon views and other aspects of the rural environment which characterizes the City;
4. Ensure that the siting, design, and massing of all new or remodeled structures or developments are compatible with existing uses, designs, and developments in surrounding neighborhoods;
5. Promote compatibility of architectural design with surrounding property; and
6. Preserve the scenic character of the City.

Development projects of less than 1,000 square feet are subject to Minor Architectural Review, which is conducted administratively by the Planning Department staff. The review is completed within 21 days following submission of complete plans. Larger projects of more than 1,000 square feet are subject to the Significant Architectural Review process. These projects are first reviewed by staff to determine completeness and compliance, and then scheduled for a Planning Commission public hearing within 30 days. There is no architectural review process required of ADUs, JADUs, or FZADUs.

To approve the architectural review, the approving body must make the following findings:

1. That the proposed development is designed and will be developed to preserve to the greatest extent practicable the natural features of the land, including the existing topography and landscaping;
2. That the proposed development is designed and will be developed in a manner which will be reasonably compatible with the existing neighborhood character in terms of scale of development in relation to surrounding residences and other structures;
3. That the proposed development is designed and will be developed in a manner which will preserve to the greatest extent practicable the privacy of persons residing on adjacent properties;
4. The requirements of the ridgeline and view preservation regulations have been met;
5. That the proposed development is designed and will be developed in a manner to the extent reasonably practicable so that it does not unreasonably interfere with neighbors' existing views, view of ridgelines, valleys, or vistas;

6. The requirements of the tree preservation and landscaping regulations have been met;
7. That the design minimizes the appearance of over or excessive building substantially in excess of existing structures in the neighborhood, in that: a. The square footage of the structure(s) and the total lot coverage of the development shall reflect the uncrowded character of the City and the neighborhood; and b. The height(s) of the structure(s) shall maintain to the extent reasonably practicable, consistency with the heights of structures on neighboring properties; and
8. That the proposed development is designed and will be developed in a manner that is consistent with the City's Design Guidelines.

Due to the unique nature and physical constraints present in Bradbury, including limited access, limited infrastructure, and fire risk, the architectural review process is necessary to ensure appropriate and safe development within the City. However, findings relating to compatibility with neighboring properties may be considered subjective. This Housing Element includes an action to review and revise the findings for approval to remove the subjective findings.

I. Local Ordinances

State law requires jurisdictions to analyze in their Housing Elements for any locally adopted ordinances that directly impact the cost and supply of residential development. In October 2018, Bradbury adopted an ordinance prohibiting short-term rentals in all residential and agricultural zones in the City. Short term rentals result in a removal of available rental housing from the market. By disallowing properties to be rented for less than a 30-day period, the ordinance is helping to preserve the supply of long-term rental properties in the City.

The City of Bradbury does not have an inclusionary housing ordinance, or any growth control measures that could potentially limit housing supply and increase costs.

The City has not adopted a local Density Bonus program in its Municipal Code. This Housing Element includes a program action for the City to incorporate the State Density Bonus law by reference into the Municipal Code and promotes density bonus incentives along with the Affordable Housing Overlay to interested developers.

J. Transparency in Development Regulations

Continuing to improve transparency related to the City's development regulations, fees, processes, and procedures is a priority for the City. To that end, Bradbury's website includes the following information:

- Adopted Housing Element:
https://www.cityofbradbury.org/services/planning_department/housing_element.php
- Municipal Code/Development Code:
https://library.municode.com/ca/bradbury/codes/code_of_ordinances?nodeId=COOR_TI_TIXDECO

- Zoning Map:
https://cms7files.revize.com/bradburyca/Document_center/Services/Planning/bradbury_zoning_map.pdf
- Building in Bradbury 101 Handout:
https://cms7files.revize.com/bradburyca/Document_center/Services/Planning/Buildingint heCityofBradbury-flyer-DM_082310.pdf
- Planning Application Form and Guidelines:
<https://cms7files.revize.com/bradburyca/APPLICATION.pdf>
- Planning Fee Schedule:
<https://www.cityofbradbury.org/Fee%20Schedule%20for%20FY%202015-2016.pdf>

K. Non-Governmental Constraints

The Housing Element is required to discuss potential non-governmental constraints related to land costs, construction costs, availability of financing, and length of time for building permit issuance. Analyses of these issues can shed light on the private market forces that affect housing availability and affordability. Additionally, depending on the extent of housing availability and affordability, this information can signal the public sector as to the need to adjust land use, zoning, and housing policies. The cost of financing, the price of land, and the cost of construction are currently rising in Southern California, such that housing is becoming less affordable. Thus, because Bradbury is almost fully developed, the primary constraint for new or additional housing development is the lack of vacant and affordable land for development.

Cost of Land

There is little vacant, developable land in the City. Many of the existing vacant parcels of land in the City of Bradbury have been owned by the same individuals or trusts for extended periods of time. Only two vacant lots have sold since 2019, according to a review of records on Zillow. The average price per acre of these lots was just under \$520,000 per acre. As of February 2022, there were three vacant lots listed for sale on Zillow. Asking prices ranged from \$987,000 per acre to \$3.3 million per acre (average of \$1.8 million per acre).³ However, it should be noted that all of these properties have been listed for sale for an extended period of time (two lots for over three years) and would likely need to be priced lower in order to sell.

Cost of Construction

According to a 2019 survey completed by the National Association of Homebuilders, construction costs comprise 61 percent of the sales price of a new single family home, on average.⁴ The survey

³ Source: Zillow, Lots/Land listed for sale; Accessed February 24, 2022.

⁴ National Association of Home Builders, 2019 Construction Cost Survey, <https://www.nahb.org/-/media/8F04D7F6EAA34DBF8867D7C3385D2977.ashx>.

found an average construction cost per square foot of \$114 for a typical single family home. However, the survey also noted that interior finishes comprise the greatest proportion of construction costs (about 25 percent). Therefore, in a community like Bradbury with high end, luxury homes, construction costs are likely much higher per square foot than average. Recently constructed homes in Bradbury have ranged from 10,000 to 15,000 square feet with building permit valuations of \$1,500,000 to \$2,250,000. Accessory living quarters (ALQs) in Bradbury typically range in size from 1,000 to 2,500 square feet and usually consist of living and dining areas, two to three bedrooms, one or two bathrooms, a kitchen, and a one or two car attached garage. The construction cost of ALQs can range from \$150,000 to \$250,000 for smaller 1,000 square foot units. The variations in construction costs depend on site preparation costs, the cost of the sewer or septic system, and the type of interior improvements.

Availability of Financing

The City of Bradbury derives its revenue from property taxes and various fees. The City does not have any retail commercial development, and does not collect development impact fees; therefore, it does not possess fiscal resources to devote to affordable housing projects. The City's limited ability to provide affordable housing programs affects its potential to reach its RHNA goal. Federal and State housing programs, which have flourished in the past, are subject to annual fluctuations based on decisions that are beyond the City's control. Bradbury is a participating city in the Los Angeles Urban County and is eligible to apply for funds available for affordable housing through the County if the need arises.

Length of Time between Application Approval and Building Permit Issuance

New State Housing Element law requires that the analysis of non-governmental constraints include a discussion of the length of time between approval of a housing development proposal and submittal of an application for building permits.

The time between approval of a proposal and building permit issuance are influenced by a number of factors, none of which are directly impacted by the City. Most residential permits in Bradbury are for individual single-family homes, with building permit issuance generally taking six to nine months after Planning Department approvals. Hillside properties may take a few months longer due to the need for technical and engineering studies and reviews.

Since 2019, the development process provides for a streamlined staff review of residential applications for projects that are less than 1,000 sq. ft. The Planning and Building Departments have been directed to complete review of development plans within 21 days of submission. Permits for a new small second/accessory unit can be issued within 60 days. If plans are simultaneously submitted to the Planning and Building Departments permits could be issued within 30 days after submittal of a complete application.

Requests to develop housing below identified densities in the sites inventory and analysis

The sites inventory does not use density to estimate the potential capacity of sites. Capacity is based on the minimum of one unit for any legally created parcel. For parcels larger than the

required lot size, the number of units on the parcel is based on the number of lots can be accommodated.

L. Environmental Constraints

There are significant environmental constraints that need to be considered when addressing future development.

Seismic Safety

The Sierra Madre Earthquake Fault Zones are in the central and northern portion of the City. Therefore, development of the hillside areas that are most susceptible to ground failure and landslide during earthquake activity should be limited to low densities and occupancies to limit the damage and casualties of earthquakes.

Protection of Open Space

The preservation of open space is essential to the community. The low-density agricultural/residential character of the City does not provide the economic resources needed to acquire and maintain an elaborate system of public parks and recreation areas. The City does not have any commercial or industrially zoned or developed property that would generate revenue to acquire and maintain such public facilities. The exclusive single-family residential zoning permits only detached dwelling units, many of which are located on large agriculturally zoned parcels of land.

The hillside topography limits development opportunities. The City's zoning regulates lot coverage based on the average slope of the parcel under consideration. The steeper the slope the more area that must remain in its natural condition. Allowable grading and lot coverage are significantly reduced on the steeper hillside lots. Open space is considered a premium asset in the community. City development standards and regulations are based on the objective of creating the maximum feasible amount of natural open space. Community residents have often expressed their desire to retain the rural character of the community and to maximize the existing open space resources.

Fire Safety

The majority of the City is in a Very High Fire Hazard Severity Zone. The wildfire risk is high at most times of the year. For example, in November 1980, fifty homes in the area were reported lost due to a wildfire. This designation of a Very High Fire Hazard Severity Zone requires incorporation of significant safety measures in the construction of new development.

Water

Water is a resource in limited supply in the southern California region. Water limitations can prevent the development of new housing. The existing domestic and fire water system is adequate for large agricultural/residential development, but the mainline water system is inadequate for small lot urban subdivisions. Therefore, the City must look closely at housing densities that may require domestic and fire water system upgrades. The City does not anticipate any water shortages

that would preclude or affect the meeting of the Regional Housing Need Allocation (RHNA) through 2029.

M. Infrastructure Constraints

The lower foothills are developed with large lot agriculture/residential single-family dwellings located in two gated communities. Access to these areas is provided by private roads having paved widths of 15 to 20 feet. Most of the vacant area within the City (302 acres) is accessible via unpaved fire roads and unpaved flood control maintenance roads. Grading of the steep hillsides is regulated in order to minimize surface run-off and degradation of the natural environment. The vacant-land area is not served by any utilities.

Surface storm water run-off is accommodated using private drainage systems. The majority of the City is not served by public sewers and most individual homes have their own private onsite septic systems to handle effluent. In addition, the public water distribution system is unable to accommodate the fire flows required for higher density development.

The City adopted a Low Impact Development (LID) Ordinance in 2013 as required by law. This requires properties with over 10,000 square feet of new impervious surface to provide on-site storm water containment. This will add costs to new construction projects with a large primary dwelling.

There are no significant infrastructure constraints related to the development of accessory living quarters or ADUs. Water and other utility connections must be made for the primary dwelling unit and should be readily extended to second units. However, additional units in many areas of the City would require the installation of additional septic systems.

N. Future Development Potential

The undeveloped parcels in the City fall into two categories: Category 1 consists of seven (7) parcels of land comprising approximately 301 acres located in the northernmost portion of the City and are subject to the City's Hillside Development Standards as set forth in the Development Code, which severely restricts grading of slopes of 10 percent and more. Category 2 consists of approximately 75 acres comprising 18 parcels which are vacant and more easily developable for single-family detached residential dwellings.

Category 1 – Open Space Privately-Owned / Undeveloped Hillside Parcels is comprised of a 301-acre area consisting of seven parcels located in the City's northern boundary area adjacent to the City of Monrovia to the west, the City of Duarte to the east, and the Angeles National Forest. The General Plan Land Use Map identifies this area as Open Space, Privately Owned Undeveloped, having a maximum density of one dwelling unit per five acres. The area has been zoned A-5 SP (Agriculture/Residential 5-acre minimum, Specific Plan).

Further subdivision of the 301 acres would be subject to review and approval of a specific plan. Associated environmental studies will address the impacts and mitigation measures associated with any future increase in residential density. The area has been reported to contain hillside slopes that are in excess of 50 percent; numerous prominent ridgelines; Blueline streams; earthquake

induced landslide zones; lack of existing public or private vehicular access; lack of existing public utilities, and habitat that could include sensitive or endangered flora and fauna. These development constraints indicate that development of the area is physically and economically difficult. This area is further restricted by being in an area designated as a Very High Fire Hazard Severity Zone in compliance with California State law. If so desired, a Specific Plan could be submitted to the City for consideration of developing the area. Use of this steep and environmentally sensitive hillside area could include the creation of a conservation/conservancy easement, the use of development right transfer strategies, and cluster development concepts.

Any development in this area would be subject to the Hillside Development Standards that are applicable to any site that consists of two acres of land area having an average slope of at least 10 percent. The intent of the Hillside Development Standards is to preserve the pristine hillsides and the mountainous topography. Grading of hillside property is restricted and controlled. The nature and extent of the grading, and the development restrictions are based on the average slope of the parcel under consideration.

The City received two proposals for development of the hillside properties, identified in the following Table IV- 8. The hillside Chadwick Ranch subdivision proposed the creation of 14 estate lots, each of which could be developed with a single-family home with a Fire Zone Accessory Dwelling Units (FZADUs), or an enhanced ADU and a JADU on each lot. However, the applications for both specific plan proposals have lapsed. Although revived proposals or other similar development proposals can still occur during the planning period of the 6th cycle, these sites are not included in the City's sites inventory for RHNA purposes. The estimate of potential

**Table IV- 8: CATEGORY 1 – OPEN SPACE PRIVATELY OWNED
HILLSIDE PARCELS**

Ownership	Assessor's No.	Acreage	Zone	Land Use	Potential DUs	Potential ADUs	Total DUs
Oakview Estates Ownership	8527-001-001	41.40	A-5 (SP)	Estate 5-Ac	0	0	0
	8527-001-008	70.00	A-5 (SP)	Estate 5-Ac	9	<u>0</u>	<u>9</u>
	8527-001-009	20.54	A-5 (SP)	Estate 5-Ac			
	8527-001-012	59.30	A-5 (SP)	Estate 5-Ac			
Chadwick Ranch Ownership	8527-001-010	59.19	A-5 (SP)	Estate 5-Ac	14	14	28
	8527-005-001	8.37	A-5 (SP)	Estate 5-Ac			
	8527-005-004	42.36	A-5 (SP)	Estate 5-Ac			
Total		301.16			23	<u>14</u>	<u>37</u>

Category 2 – Vacant Undeveloped Residential Parcels is comprised of 17 vacant undeveloped residentially designated and zoned parcels. All of these sites are considered as appropriate for development of single-family detached residential dwelling units (see Table IV- 9). The identified vacant developable residential parcels on the 74 acres could potentially yield 27 new main dwelling units. The estimate of realistic capacity is based on the minimum lot size required for the zone, assuming larger lots would be subdivided but taking into account some topographical constraints. However, each legally created lot is allowed one unit regardless of lot size.

**Table IV- 9: CATEGORY 2 –
VACANT UNDEVELOPED RESIDENTIAL PARCELS**

	Assessor's No.	Address	Parcel Size (acres)	Zone	Land Use	Potential Main DUs
1	8527-002-023	153 Sawpit Lane	5.58	A-5	Estate 5-Ac	1
2	8527-004-020	155 Bliss Canyon Rd.	2.12	A-5	Estate 5-Ac	1
3	8527-016-049	370 Mt. Olive Dr.	8.01	A-2	Estate 2-Ac	3
4	8527-016-019	360 Mt. Olive Dr.	2.03	A-2	Estate 2-Ac	1
5	8527-016-046	336 Mt. Olive Dr.	2.18	A-2	Estate 2-Ac	1
6	8527-016-037	1387 Sharon Hill Ln.	1.18	A-2 (SP)	Estate 2-Ac	1
7	8527-021-011	8 Bradbury Hills Rd.	1.54	A-2	Estate 2-Ac	1
8	8527-024-032	676 Deodar Ln.	5.3	A-5	Estate 5-Ac	1
9A	8527-025-034	208 Barranca Rd.	3.39	A-5	Estate 5 Ac	1
10	8527-026-006	218 Deodar Ln.	2.90	A-5	Estate 5-Ac	1
11	8527-029-001	431 Long Canyon Rd.	2.54	A-5	Estate 5-Ac	1
12	8527-029-017	410 Long Canyon Rd.	7.16	A-5	Estate 5-Ac	1
13	8527-023-012	Royal Oaks Dr. N.	2.13	A-1	Estate 1-Ac	2
15	8527-023-021	1533 Royal Oaks Dr. N.	3.80	A-1	Estate 1-Ac	3
16	8527-002-029	Oak Meadow Ln.	7.16	A-5	Estate 5-Ac	1
17	8527-002-030	Oak Meadow Ln.	4.65	A-5	Estate 5-Ac	1
18	8527-021-041	1901 Royal Oaks Dr. N.	12.4	A-1	Estate 1-Ac	6
Total			74.07			27

Category 3 – Second Units or ADUs/JADUs on Development Properties

The third category is infilling properties with existing units with ADUs or JADUs. This realistic capacity is estimated based on trends.

Regional Growth Need

As described in Chapter III, State Housing Element law requires that a local jurisdiction accommodate a share of the region's projected housing needs for the planning period. This share, called the Regional Housing Needs Allocation (RHNA), is important because State law mandates that a jurisdiction provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the

jurisdiction's ability in providing adequate land with adequate density and appropriate development standards to accommodate the RHNA.

SCAG assigned a RHNA of 41 units to the City of Bradbury for the 2021-2029 planning period. This allocation is distributed into four income categories, as shown below, in the following income distribution:

**Table IV- 10: REGIONAL HOUSING NEEDS ASSESSMENT
2021-2029**

Income Level	Percent AMI*	# of Units	Percent
Extremely Low**	0-30%	8	19.5%
Very Low	31-50%	8	19.5%
Low	51-80%	9	22%
Moderate	81-120%	9	22%
Above Moderate	>120%	7	17.0%
Total		41	100%

Source: SCAG 6th Cycle Final RHNA Allocation Plan (approved by HCD on 3/22/21).
 *AMI - Area Median Income
 **State law requires jurisdictions to also projects housing needs for extremely low income households. SCAG does not differentiate between very low (VLI) and extremely low income (ELI) needs in the RHNA. Pursuant to State law, the City can evenly split the very low income RHNA into very low and extremely low incomes.

Sites Inventory

This section discusses how Bradbury has adequate existing residential site capacity to accommodate its share of regional housing needs during the planning period. Based on the current availability of Category 1 (Privately-Owned Hillside Parcels), Category 2 (Vacant Undeveloped) as well as potential Second Dwelling Units, SROs, and units in the Affordable Housing Overlay, the City's has a potential for **71** total units. A detailed methodology and assumptions to estimate capacity is described below.

Category 1: Privately-Owned Hillside Parcels

If developed, these 300 acres could accommodate at least 37 units based on previous proposals. However, as discussed before, the applications for both specific plan proposals have lapsed. Therefore, as a conservative strategy, these sites are not included in the City's sites inventory for 6th cycle Housing Element RHNA.

Category 2: Vacant Undeveloped Land

Single-Family Units

Table IV- 9 identifies **17** vacant undeveloped residentially designated and zoned parcels on the **74.07** acres could yield **27** new main dwelling units. This capacity is based on the minimum of one unit for any legally created parcel. For parcels larger than the required lot size, the number of units on the parcel is based on the number of lots can be accommodated, assuming subdivision of lots. All 27 units on the 17 parcels are counted toward the City's above moderate income RHNA.

SRO Development

The City amended the Development Code in October 2022 to make several significant changes to facilitate SRO development:

- Individual SRO units (no cooking facilities) and bunk houses (only shared cooking and plumbing facilities, which are similar to JADUs) were eliminated as separate uses.
- SRO developments of at least two units are allowed in all agricultural zones.
- SRO units require independent cooking and plumbing facilities to function as separate living units.
- Number of units allowed in an SRO Development is increased in the A-1 zone from 3 to 4 and in the A-2 zone from 5 to 6. SRO Developments in the A-5 zone remain at 10 units.
- Allowable unit size is increased from 250 to 300 square feet.
- The requirement that the SROs be occupied by domestic help was eliminated.

All these changes are intended to further facilitate the development of SRO units as an alternative affordable housing option to workers in the City and also to other residents.

Based on City records, the majority of the City's recent housing projects include accessory living quarters. Specifically, 13 current or recently completed projects have included accessory living quarters, including six projects contain living quarters for domestic help and seven projects have guest houses with kitchens. The City amended the Development Code to encourage SRO developments (2+ units) for domestic help and farm/ranch workers, family members, and/or used as rentals. The City eliminated the "bunk house" unit type, which is similar to the new definition of SRO development. Therefore, future development of accessory living quarters on large lots is expected to take the form of SRO development. Based on these conditions, it is reasonable to assume that half of the vacant parcels (nine parcels) identified in Table IV- 9 would include at least a two-unit SRO development, yielding 18 SRO units.

As shown in the previous Chadwick Ranch proposal, all lots are proposed to include accessory units, noting that the proposal was submitted prior to the much more generous allowance of SRO development. Therefore, consistent with the Chadwick Ranch proposal, these 17 lots at a minimum can include 17 ADUs.

Assuming half of the lots would develop SRO development or all lots would include an ADU, both scenarios would produce 16 or 17 additional units,⁶ respectively. Since the 17 lots could be subdivided into 27 lots as discussed before, the maximum capacity could be 26 SRO units (if half

⁶ For SRO estimates, because of the uneven number of lots, "half" of them is either of either eight or nine lots. If each lot is expected to have at least two SRO units, the expected SRO capacity is 16 or 18 units, respectively. The lower number of 16 units is used as a conservative estimate.

of the subdivided lots have SRO units)⁷ and 27 ADU units. Therefore 16-unit SRO capacity assumed for RHNA represents a conservative 60 percent of the maximum potential.

The affordability assumption for these 16 SRO units (or ADU units) was based on SCAG's affordability assumption (4 extremely low/very low, 7 low, 0 moderate, and 5 above moderate; Table IV- 11). Together with 27 main dwelling units, there is a potential for 43 units in Vacant Undeveloped Land.

Table IV- 11: Vacant Undeveloped Land Units by Income Level

	EL/VL	L	Mod	AM	Total
Main Dwelling Units	--	--	--	27	27
SRO <u>Developments (2+ units per development)</u> ¹	4	7	0	5	16
Total	4	7	0	32	43
1: ADU affordability based on SCAG assumptions: 15.0 percent extremely low, 8.5 percent very low, 44.6 percent low, 2.1 percent moderate, and 29.2 percent above moderate. <u>The proportion calculations resulted in 4.0 EL/VL units, 7.6 low units, 0.4 moderate units, and 5.1 above moderate units. Numbers were rounded to the nearest whole number. However, when numbers were rounded, the total was 17. Because the proportion of moderate units was closer to 0 than 1, the estimated number of units is zero.</u>					

Category 3: Accessory Dwelling Units on Developed Parcels

In addition to units that can occur on vacant lots as noted above, existing developed parcels can add ADUs. (There is no overlapping in the estimates of potential ADUs on vacant sites versus potential ADUs on sites with existing homes. These estimates are based on separate trends.) The City estimates 104 second dwelling units in the City, compared to 385 primary units in the City as reported by the ACS, representing a significant proportion (21 percent) of the overall housing stock. Between 1994 and 2014, the City approved 36 second dwelling units (or 1.5 second units annually). Between 2014 and 2021, the City added seven second dwelling units (or one second unit annually). With the City's recent amendment to the ADU Ordinance in 2021 and 2022, the City anticipates an increased trend of building ADUs in the community. Therefore, it is reasonable to conservatively assume that eight ADUs will be added to properties with existing units over the 2021-2029 Housing Element period (or just one ADU annually). The assumed affordability of these units was based on SCAG's affordability assumptions (2 extremely low/very low, 3 low, 1 moderate, and 2 above moderate; Table IV- 12).

⁷ Similar to footnote 6, because of the uneven number of lots, "half" of them is 13 or 14 lots. If 13 or 14 lots are expected to have at least two SROs, the expected SRO capacity is 26 or 28 SRO units, respectively. The lower number of 26 units is used as a conservative estimate.

Table IV- 12: 2nd Unit/ADU Units by Income Level

	EL/VL	L	Mod	AM	Total
ADUs ¹	2	3	1	2	8
1: ADU affordability based on SCAG assumptions: 15.0 percent extremely low, 8.5 percent very low, 44.6 percent lo, 2.1 percent moderate, and 29.2 percent above moderate/					

Affordable Housing Overlay

The City proposes to amend the Affordable Housing Overlay Zone to permit multi-family affordable housing at a density range of 20-35 units per acre, and apply the Overlay Zone to the City Hall site. A significant portion of the 1.1-acre City Hall site is used for open space and parking and can accommodate a small multi-family affordable development. The sites inventory assumes development in half of the City Hall site (approximately 0.55 acre) at a density of 35 du/ac for a total of 18 units. Figure IV- 2 shows the affordable housing overlay 6th cycle site in the red area. The boundaries of the AHO are shown in red dashed lines. **The Housing Plan includes an action to establish development standards that can facilitate the development of 18 units on site.**

The City-owned site currently only has one structure – City Hall. The AHO is located in the portion of the site that does not have any building structures. The City has not leased out this site to any agency or entity. There is no need to relocate any existing use. This Housing Element includes a program to develop appropriate development standards to accommodate 18 units at a density of 35 units per acre. As shown in the Multi-Family Housing Program under Policy 2, the City intends to make the site available for affordable housing development through a land lease agreement with a qualified affordable housing developer. This property would be exempt surplus property under the Surplus Land Act. By the end of 2024 and annually thereafter, the City will conduct outreach to developers to facilitate development of affordable housing on this site. The Multi-Family Housing Program also includes an alternative action to designate other properties as AHO if no interest is expressed on the City-owned site.

Figure IV- 2: Affordable Housing Overlay- Site

Summary of Sites

Table IV- 13 below shows that the City of Bradbury has adequate land capacity to meet the needs of all income groups through the 2021-2029 RHNA period. There is a capacity of 26 lower income units, 9 moderate income units, and 34 above moderate units for a total of 69 units. There is also additional capacity in the remaining parcels in the Privately-Owned Hillside Parcels (Table IV- 8) which have lapsed applications and are not used for this RHNA. Figure IV- 3 shows the location of the sites in the Vacant Underdeveloped parcels and the Affordable Housing Overlay. The only nonvacant site used to meet the City's lower income RHNA requirements is the Affordable Housing Overlay on the City Hall site. The Housing Plan includes actions to facilitate development on this site.

Environmental Constraints

The vacant sites identified for single-family and potential SRO units are larger lots and appropriate for the allowable development. The AHO site is located in the most urbanized area of the City and is not impacted by environmental constraints that would impede residential development. There are also no other constraints such as title conditions, easement, or litigation that would preclude development on sites identified in the planning period. The City will allow flexible development standards on the AHO site to account for the lot shape in order to accommodate the required units for its lower and moderate income RHNA.

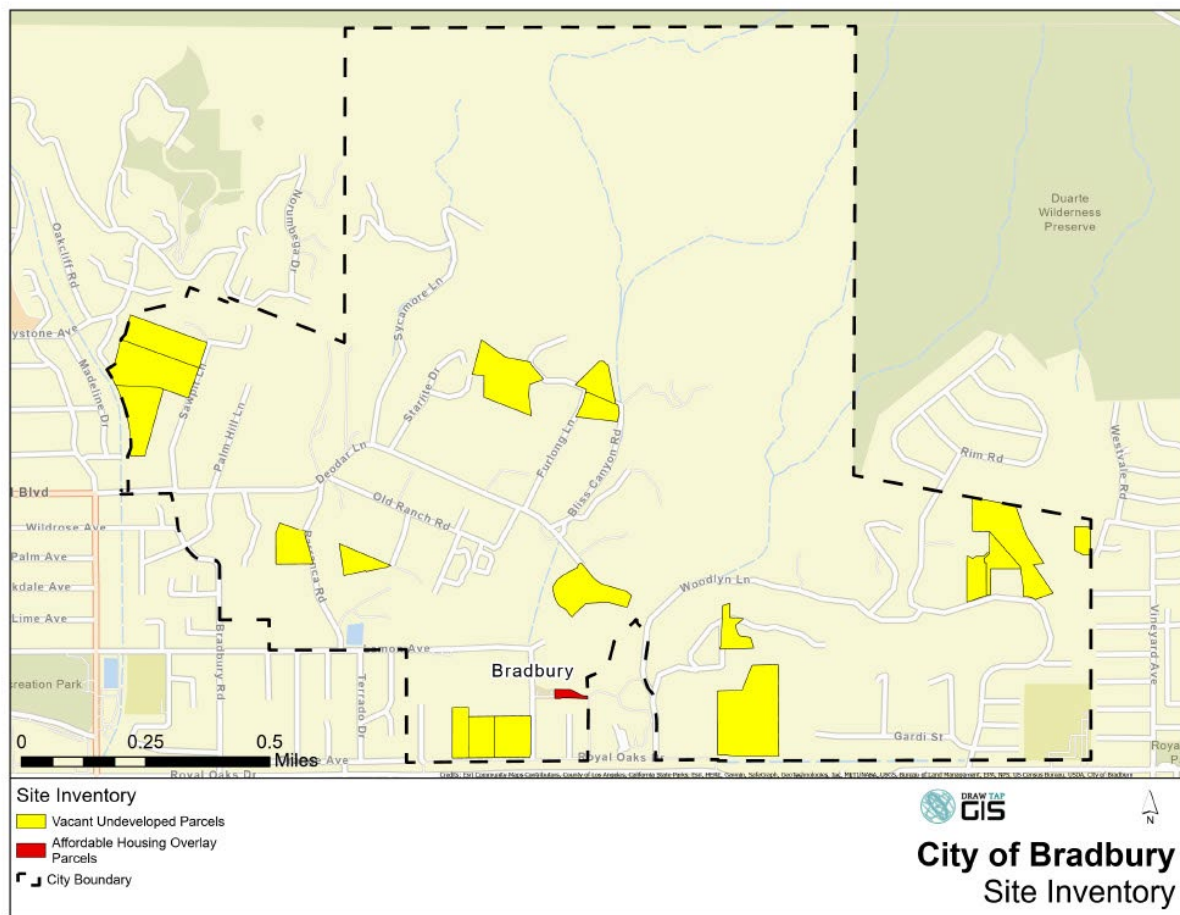
Table IV- 13: Summary of Development Potential

	Extremely Low/ Very Low	Low	Moderate	Above Moderate	Total
RHNA	16	9	9	7	41
RHNA ¹	25		9	7	
Vacant Undeveloped Parcels	---		---	27	27
SRO Developments on Vacant Undeveloped Parcels	11		0	5	16
2 nd DUs / ADUs / JADUs on Developed Parcels with Existing Units	5		1	2	8
Affordable Housing Overlay	10		8		18
Total Sites Inventory	26		9	34	69
Surplus/Shortfall	+1		+0	+27	+28
Notes:					
1) Combining extremely low, very low, and low into a “lower” income category					
2) Project application at Chadwick Ranch Estates.					

Sites Used in the Prior Cycle Housing Element

For the 5th cycle Housing Element, the City’s RHNA was only two units (one very low income unit and one low income unit). The 2014-2021 Housing Element utilized the Affordable Housing Overlay to meet its lower income RHNA. Therefore, the only "reuse" site for lower income RHNA for the 6th cycle Housing Element is the City Hall site with the Affordable Housing Overlay.

Figure IV- 3: Bradbury Sites Inventory



O. Energy Conservation and Climate Action Plan

Housing Element statutes require an analysis of opportunities for energy conservation with respect to residential development. The energy conservation section of the element must inventory and analyze the opportunities to encourage the incorporation of energy saving features, energy saving materials, and energy efficient systems and design for residential development. Planning to maximize energy efficiency and the incorporation of energy conservation and green building features can contribute to reduced housing costs for homeowners and renters, in addition to promoting sustainable community design and reduced dependence on vehicles. Such planning and development standards can also significantly contribute to reducing greenhouse gases.

Green Building Practices – Conventional building construction, use, and demolition, along with the manufacturing of building materials, have multiple impacts on our environment. In the United States, buildings account for:

36% of total energy use	30% of raw materials use
65% of electricity consumption	30% of landfill waste
30% of greenhouse gas emissions	12% of potable water consumption

Green buildings are structures that are designed, renovated, re-used or operated in a manner that enhances resource efficiency and sustainability. These structures reduce water consumption, improve energy efficiency, generate less waste, and lessen a building's overall environmental impact. The [2022 California Building Standards Code](#) establishes mandatory Statewide green building standards, and Bradbury has adopted the California Green Building Standards Code (CALGREEN) in its entirety. The City promotes "Green and Beautiful Bradbury" on the City website, providing user-friendly information about energy conservation, suggestions to improve energy efficiency, and appliance rebate programs.

Energy Conservation Programs Offered through Local Utilities and the State - Bradbury promotes energy conservation by advertising utility rebate programs and energy audits available through Southern California Edison (SCE), and the Southern California Gas Company. Lower-income households are also eligible for State sponsored energy and weatherization programs.

SCE provides a variety of energy conservation services under its Customer Assistance Programs (CAPs). These services are designed to help low-income households, senior citizens, the permanently disabled, and non-English speaking customers control their energy use. The Southern California Gas Company offers an energy conservation service known as the Community Involvement Program (CIP). This program provides weatherization for the homes or apartments of low-income families, provided they meet the federally established income guidelines. The weatherization is provided to the low-income families free of charge, with the providers to be reimbursed by the Southern California Gas Company.

Income-qualified SCE and Southern California Gas Company customers may be eligible for the State's Energy Savings Assistance program, and/or a 20% discount under the California Alternate Rates for Energy (CARE) program.

The Energy Upgrade California (EUC) Residential Energy Efficiency Loan (REEL) program is designed to help California homeowners and renters access competitive financing solutions for their energy efficiency projects.



Housing Element 2021-2029

CHAPTER V

REVIEW OF HOUSING ELEMENT PERFORMANCE

A. Progress in Implementing the 2014-2021 Housing Policies and Programs

The following matrix summarizes the performance of the 2014-2021 Housing Element Goals and Policies.

TABLE V-1
EVALUATION OF HOUSING ELEMENT POLICIES AND PROGRAMS

Program	Action	<u>Progress and Evaluation</u>	<u>Continued Appropriateness</u>
Policy 1: Promote and cooperate in the enforcement of fair housing laws.			
Fair Housing Information Program	Publicize fair housing information.	The City coordinates with and refers complaints concerning housing discrimination to the Long Beach Fair Housing Council. The City continues to provide fair housing information to the public as needed. Written and printed information is available at City Hall, provided in newsletters, and information is posted on the City's website: https://www.cityofbradbury.org/services/planning_department/fair_housing_information.php	<u>The Housing Element includes an expanded fair housing program to comply with the new Affirmatively Furthering Fair Housing requirements.</u>
Policy 2: Promote the development of a variety of housing types and continue to identify sites that are available for new residential development.			

Program	Action	<u>Progress and Evaluation</u>	<u>Continued Appropriateness</u>
Site Inventory Program	Provide info about vacant sites.	The City maintains a map of vacant sites and underutilized parcels and makes it available to interested realtors and developers.	<u>The sites inventory map is updated in the Housing Element. The City will continue to make the map(s) available to the public and interested developers. The City is also amending the Development Code to facilitate SRO developments and to apply the Affordable Housing Overlay to the City Hall site. The Overlay will also be amended to permit multi-family affordable housing development.</u>
Zoning Code Provisions for Special Needs Households	Amend the Development code to define and explicitly permit small and large community care facilities.	In January 2019 the City adopted an amendment to the Development Code (Ord. 362) to add definitions for small and large Residential Care Facilities, consistent with Health and Safety Code Section 1502. Small residential care facilities (6 or fewer occupants) are a permitted use in all residential zones, and large residential care facilities (7 or more occupants) are conditionally permitted in the R-20,000, A-1, A-2 and A-5 zone districts.	<u>The City will make further amendments to the Development Code to address recent changes in State law regarding emergency shelters.</u>
Multi-Family Land Use/ Zoning Program	Amend the Development code to explicitly permit multi-family rental housing of up to 5 units as an accessory use in the A-1, A-2, and A-5 zone districts. Evaluate the allowing of an efficiency kitchen in individual SRO units, such as that defined under State law for junior accessory dwelling units.	The City defines multi-family dwelling as a detached building of two or more accessory SROs and defines "SRO development" as an accessory building used primarily for multi-tenant SRO units, containing two or more SRO units with a shared kitchen and laundry facilities. SRO buildings of up to <u>four</u> units are now permitted in the A-1 zone, up to <u>six</u> units in the A-2 zone, and up to 10 SRO units in the A-5 zone. Kitchen facilities are <u>now required</u> in individual SRO units.	<u>Zoning Code amendments completed.</u>
Zoning for Employee Housing	Review the City's development standards and processing procedures for small employee housing for consistency with the Employee Housing Act and amend the Development Code as appropriate.	The City has not yet amended the Development Code to comply with State Employee Housing Act.	<u>This Housing Element includes a program to address Employee Housing Act requirements.</u>

Program	Action	Progress and Evaluation	Continued Appropriateness
Policy 3: Continue to encourage housing for low- and moderate-income households through the preservation and development of second dwelling units, accessory dwellings units (ADUs) and guesthouses.			
Second Unit Program / Second Unit Promotion Program	<i>Revise the City's "Building 101" handout which includes information on standards for the variety of accessory living quarters permitted in the City.</i>	<p>Second units have been encouraged throughout the community, and the Development Code (9.85. Secondary Living Quarters & Ord. 373 <u>and 383</u>) allows a variety of "Accessory Living Quarters" as second units. From 2014-2018, a total of six second dwelling units were approved for construction, and one was approved in 2019. There were 97 second units in the City according to a 2009 survey, bringing the total to "at least" 104.</p> <p>The City has not yet revised the Building 101 handout to include ADUs.</p>	<u>This Housing Element includes a program to facilitate ADU production by creating pre-approved plans for ADUs. The City will also create a separate ADU handout that includes information on standards for the variety of accessory living quarters permitted in the City.</u>
Accessory Dwelling Unit Program	<p><i>Completion of Zoning Code Section 9.85.040 by 2019</i></p> <p><i>Update 2009 Accessory Dwelling Unit Survey by 2020.</i></p>	Pursuant to recent changes in State law pertaining to accessory dwelling units (ADUs), the City amended the Development Code to specifically define and regulate ADUs of 1,000 square feet or less in size consistent with State law. These amendments were adopted in March 2021 <u>and updated in July 2022.</u>	<u>This Housing Element includes a program to facilitate ADU production by creating and ADU handout and creating pre-approved plans for ADUs.</u>
Policy 4: Continue to work to remove governmental constraints that limit or discourage the development of new housing in the City.			
Development Streamlining Program	<i>Prepare an updated Building 101 handout to provide clear information to development applicants.</i>	<p>Planning review to be administrative rather than by Planning Commission for one-story houses and second units up to 1,000 square feet by Ord 316 (2010). The Planning and Building Departments have been directed to complete review of such development plans within 21 days of submission. Permits for a new small second unit can be issued within 60 days. If plans are simultaneously submitted to the Planning and Building Departments permits could be issued within 30 days after submittal of a complete application.</p> <p>The City updated it's Building 101 handout to provide clear information to development applicants, and is available on the City's website at https://cms7files.revize.com/bradburyca/Document_center/Serv</p>	<u>This Housing Element includes a program to facilitate ADU production by revising the Building 101 handout and to create pre-approved plans for ADUs.</u>

Program	Action	Progress and Evaluation	Continued Appropriateness
		ices/Planning/BuildingintheCityofBradbury-flyer-DM_082310.pdf	
Reasonable Accommodation Program	<i>Add specific procedures for Reasonable Accommodation to the Municipal Code.</i>	The City has added a new Chapter 29 "Reasonable Accommodation Process for Disabled Persons" to the Municipal Code. This chapter establishes procedures for disabled persons, or their representatives, to request a reasonable accommodation from the City's zoning laws, building codes, and land use regulations, policies and procedures to allow a disabled person an equal opportunity to enjoy housing equal to that of non-disabled persons.	<u>This program is completed.</u>
Housing Opportunities for Persons Living with Disabilities	<i>Make information available on the City's website regarding services available through the San Gabriel Valley/Pomona Regional Center.</i>	The City added information on its website regarding services available to children and adults with developmental disabilities through the San Gabriel/Pomona Regional Center but the link has since become inactive. The City will address this in the 2021-2029 HE. http://www.cityofbradbury.org/city-services/planning-department/housing-information	<u>This Housing Element also includes addressing the zoning provisions for large residential care facilities.</u>
Policy 5: Conserve and improve the existing housing, including affordable housing.			
Code Enforcement Program	<i>Based on estimated code enforcement case loads, the City anticipates four units will be rehabilitated during the planning period.</i>	The City implements a proactive program of Code Enforcement to ensure that all dwelling units and grounds are properly maintained.	<u>The City will continue its Code Enforcement program.</u>

Program	Action	Progress and Evaluation	Continued Appropriateness
Historic Preservation Program and Mills Act	<i>Conserve the four residential structures identified as historically significant in the General Plan and encourage additional property owners to pursue listing and Mills Act incentives.</i>	The City continues to provide a preservation and rehabilitation incentive program that provides tax relief to designated historic resources within the community. The historic properties can utilize tax savings to upgrade plumbing, heating, and other essential housing features. The City continues to offer the program but does not yet have any Mills Act properties in the City.	<u>The City will continue to offer Mills Act incentives to encourage historic preservation.</u>
Policy 6: Assist and address the needs of the homeless.			
Emergency Shelter Program	<i>Amend the Land Use Map to designate the City Hall site with the Affordable Housing Overlay.</i>	Ord. 316 created an emergency shelter overlay that can be applied to any residentially-zoned property. The City has an Affordable Housing Overlay (AHO) Zone to allow for emergency shelters with up to six occupants in all residential zones without a conditional use or other discretionary permit. Based on direction from State HCD, in order to ensure explicit compliance with SB 2 governing by-right zoning for emergency shelters, the City has amended the Land Use Map to designate the City Hall site with the AHO, as well as continuing to allow the AHO to function as a floating zone on residentially zoned properties. .	<u>This Housing Element is proposing to amend the AHO to include multi-family affordable housing as a permitted use</u>
Transitional and Supportive Housing Program	<i>Amend the Development Code to regulate transitional housing and supportive housing as permitted residential uses in all residential zoning districts.</i>	The City amended the Development Code to add definitions for supportive and transitional housing consistent with Government Code Section 65582. Transitional and supportive housing are identified as permitted uses in all zones where residential is permitted (R-7,500, R-20,000, A-1, A-2, A-5), subject only to those restrictions that apply to other residential uses of the same type in the same zone. .	<u>This program is completed. The Affordable Housing Overlay Zone permits transitional and supportive housing. As the City has no other multi-family or mixed use zones, it is not subject to AB 2162 Supportive Housing requirements</u>

Program	Action	Progress and Evaluation	Continued Appropriateness
Homeless Outreach Program	<i>Work with social service agencies providing services to homeless persons/families.</i>	Over the past few years, the City has been financially supporting organizations that provide housing and shelter to those in need. The City budgeted and allocated \$3,000 to donate to Union Station Homelessness Services (\$1,500) and Foothill Unity Center (\$1,500) for fiscal year 16/17 and 18/19. In 19/20 the amount was split between the two organizations as well as Friends in Deed in Pasadena. The amount allocated has increased to \$4,000 for 2020/2021.	<u>The City will continue to support homeless outreach and supportive services.</u>
Service Support for the Homeless and Other Special Needs Populations	<i>Continue to support agencies that serve the homeless and other special needs populations, such as persons with disabilities.</i>	See accomplishments above.	<u>The City will continue to support services for homeless and special needs populations. This program is combined with the homeless outreach program above.</u>
Policy 7: Promote and encourage energy conservation and affordable housing.			
Energy Conservation Program	Provide information on green building techniques to property owners and builders. Work collaboratively with regional partners to implement Climate Action Plan.	The City continues to provide green building techniques to property owners and builders. Additionally, the City continues to work toward implementing Climate Action Plan goals, such as encouraging participation in Energy Upgrade California, showcasing City facility landscaping as a demonstration site for water-efficient vegetation, and promoting the retention of natural vegetation.	<u>This Housing Element's Energy Conservation Program includes an action to create a Green Building Handout ti be posted on the City's website. The City will continue to Provide information on green building techniques to property owners and builders. Work collaboratively with regional partners to implement Climate Action Plan.</u>
City Outreach Program	Utilize the City newsletter, website, and other outreach measures to educate the community on housing issues, such as fair housing, ADUs, group homes, SROs, assistance to homeless, and energy conservation.	The City continues to provide fair housing information to the public as needed. Written and printed information is available at City Hall, provided in newsletters, and is posted on the City's website: https://www.cityofbradbury.org/services/planning_department/fair_housing_information.php The City continues to provide and maintain information about green building techniques to property owners and builders. Additionally, the City continues to work toward implementing	<u>This program is continued in the Housing Element</u>

Program	Action	<u>Progress and Evaluation</u>	<u>Continued Appropriateness</u>
		Climate Action Plan goals, such as encouraging participation in Energy Upgrade California, showcasing City facility landscaping as a demonstration site for water-efficient vegetation, and promoting the retention of natural vegetation.	

B. Addressing the 2014-2021 Housing Element Objectives

Housing Production – The Southern California Association of Governments (SCAG) adopted a future housing need under the Regional Housing Needs Assessment (RHNA) of two units for Bradbury during the 2014-2021 Housing Element period. Based on estimated production levels of three new residential units per year (two single-family homes and one second unit), the City's Housing Element set a quantified objective to produce 2 new units during the eight-year planning period.

As shown in the following Table V-2, a total of 14 net new dwelling units were issued building permits between October 2013 (the start of the RHNA planning period) and December 2020. Of these permits, seven were for single-family homes and seven were for second dwelling units. As all of the second units were over 2,000 square feet in size, it is assumed they serve above moderate income households. The City developed an accessory dwelling unit (ADU) ordinance (Ord. 373, March 2021) consistent with State Law that would limit their size to a maximum of 1,000 square feet, and include other provisions designed to facilitate the production and affordability of ADUs; this Ordinance was updated in July 2022. The City will continue to promote the development of these ADUs among homeowners as a means of addressing its new RHNA for 25 lower income units.

**TABLE V-2
UNITS BUILT DURING THE PLANNING PERIOD 2014-2020**

	Extremely/ Very Low	Low	Moderate	Above Moderate	Total
RHNA Goal	1	1	0	0	2
Quantified Objective	1	1	6	16	24
New Building Permits (2014-2021)					
Net New Single-Family Dwellings ¹	0	0	0	7	7
Second Dwelling Units	0	7	0	0	7
Total Dwelling Unit Increase	0	7	0	7	14

¹ For purposes of assessing progress towards meeting RHNA goals, only net new units are included. So while the City issued a total of 19 building permits for single-family units during the planning period, just seven units did not involve the demolition of an existing unit. Because the City's ADUs and second units are typically available for domestic help and farm/ranch workers at no costs, these units are assumed to be affordable to low income households.

Housing Rehabilitation – Bradbury's 2014-2021 Housing Element established a rehabilitation objective of four units (all above moderate income) to be achieved through the City's code enforcement program. The City addresses code enforcement issues for one to two units monthly. However, the City did not provide any financial assistance for improvements.

Housing Conservation – The 2014-2021 Housing Element established a goal to conserve the four residential structures identified as historically significant in the General Plan. These historic properties have, so far, been maintained during the planning period. The City has adopted an ordinance enacting the Mills Act that offers tax incentives for rehabilitation of historic properties, though none of these properties have yet utilized the program.

Effectiveness in Addressing Special Needs Housing – The City of Bradbury pursued housing opportunities and service support for the special needs. Specifically:

- In January 2019 the City adopted an amendment to the Development Code (Ord. 362) to add definitions for small and large Residential Care Facilities, consistent with Health and Safety Code Section 1502. Small residential care facilities (6 or fewer occupants) are a permitted use in all residential zones, and large residential care facilities (7 or more occupants) are conditionally permitted in the R-20,000, A-1, A-2 and A-5 zone districts.

The same ordinance also addresses the provision of SRO development in A-1 zone (up to 3 units), A-2 zone (up to 5 units), and A-3 zone (up to 10 units).

- In 2021, the City further amended the Development Code to provide for JADUs and Fire Zone ADUs.
- In September 2018, the City amended the General Plan Land Use Map to apply the Affordable Housing Overlay Zone to the City Hall site, permitting emergency shelters, transitional, and supportive housing by right on the one-acre site (City Council Resolution No. 18-25).

Elderly and Disabled Households

The City has included an evaluation of this type of house sharing as a program in the previous housing element, however the City has found that the elderly in need of assistance typically share housing arrangements with members of their own family. During the 2013-2021 planning period, the City also provided assistance to one elderly household with cleanup and minor repairs using General Funds.

Farmworker/Employee Housing

Several of the larger estates in the City have agricultural uses or equestrian ranches. The property owner is often employed in another occupation while maintaining the agricultural and/or equestrian uses on the property through the employment of grooms and other personnel. These personnel often live full-time on the property in an accessory living quarter. During the 2013-2021 planning period, the City averaged one accessory dwelling unit annually.

The Bradbury Development Code allows several accessory living quarter types that are suitable for farmworkers employed in the community. These include SRO units, SRO developments, bunk houses, ADUs, and JADUs. The City recently amended the Development Code to consolidate bunk houses with SRO developments. A single SRO unit is removed as a permitted use, as it does not function as a dwelling unit. This change will facilitate the development of SRO units. Instead, the City will encourage the development of ADUs and JADUs.

The 6th Cycle Housing Element includes a program to review its development standards and processing procedures for small employee housing for consistency with the Employee Housing Act and amend the Development Code as appropriate.

Persons Experiencing Homelessness

According to SCAG, neither the City nor Los Angeles County have identified any individuals experiencing homelessness in Bradbury. Any homeless people in the City would be served by facilities and programs in the nearby City of Pasadena. These programs include a rotating winter shelter program (provided by the Ecumenical Council of Pasadena Area Churches), several emergency and transitional shelters, and permanent supportive housing. The San Gabriel Valley Consortium on Homelessness maintains an on-line database of services available to the homeless in the San Gabriel Valley (www.sgvc.org).

In addition, the City of Bradbury periodically provides financial assistance to shelters in the surrounding area that provide housing and assistance to the homeless. The City budgeted and allocated \$3,000 to donate to Union Station Homelessness Services (\$1,500) and Foothill Unity Center (\$1,500) for FY 16/17 and 18/19. In 19/20 the amount was split between the two organizations as well as Friends in Deed, Pasadena. The allocation has increased to \$4,000 for 2020/2021. The Housing Element continues the program to support agencies that serve the homeless and other special needs populations, subject to funding availability.



Housing Element 2021-2029

CHAPTER VI

HOUSING POLICIES, PROGRAMS & QUANTIFIED OBJECTIVES

A. Housing Policies and Programs

The City of Bradbury Housing Element provides for the creation or continued implementation of a number of programs that will accomplish the following:

- ***New Housing-*** The City is providing opportunities for the development of a variety of new housing. The City will continue to encourage the development of accessory living units, including ADUs, JADUs, SRO developments, domestic quarters for domestic help, as well as ranch/farm workers. Specifically, the City will accommodate a variety of housing types by amending the Affordable Housing Overlay Zone to include multi-family affordable housing as an allowable use. In addition, the City will strive to continually streamline its permit processing and fee structure to remove potential governmental constraints.
- ***Housing Conservation/Preservation*** - The City is preserving existing homes and neighborhoods through the implementation of a proactive code enforcement program. In addition, the City adopted a historic preservation ordinance that enables use of the Mills Act to provide incentives for preservation of the existing housing stock.
- ***Rehabilitation*** - The City will continue its successful code enforcement program to ensure maintenance of the City's aging housing stock.
- ***Other Housing Policies*** - The City will continue to provide outreach regarding fair housing, homeless services, and energy conservation. Subject to funding availability, the City will also continue to support the provision of services to homeless and other special needs populations.

These Housing Policies are intended to underscore Bradbury's commitment to continued maintenance, improvement and provision of housing for all economic segments of the community. This chapter provides specific program details that will aid in the implementation of the City's housing policies, including program timing, funding sources, and monitoring responsibility.

A new requirement of State Housing Element law is to affirmatively further fair housing (AFFH). Given the small size of the City, limited resources are available to implement extensive AFFH activities. However, many housing programs do have impacts on furthering fair housing choices. Therefore, the relevant AFFH themes are identified for each program, as appropriate. The AFFH themes are:

- Fair Housing Outreach and Enforcement
- Place-Based Strategies for Neighborhood Improvement
- Tenant Protection and Anti-Displacement
- Housing Mobility
- New Opportunities in High Resource Areas

Policy 1: Affirmatively further fair housing.

Program 1: Fair Housing Outreach and Education - The City will continue to coordinate with and refer inquiries and complaints concerning housing discrimination to the Housing Rights Center. The City will also maintain information regarding other agencies that may assist in the enforcement of fair housing laws. The City will provide brochures and other information regarding fair housing requirements and the availability of services that can be used by residents seeking assistance. Fair housing information will be provided at City Hall and will be posted on the City's website.

Actions and Timing:

- By July 2023, update City website to provide links to the Housing Rights Center (<https://www.housingrightscenter.org/>) for fair housing services.
- Annually publish fair housing information and services on City newsletter and social media.
- By July 2023, provide fair housing information at public counters.
- By the end of 2023, include a fair housing fact sheet to be included in the City's application packets for ADU/JADU, SRO development, and SB 9 permits.

Funding: General Fund and services provided through City participation in Los Angeles Urban County CDBG program

Monitoring: Administrative Assistant

AFFH Themes Addressed:

- Fair Housing Outreach and Enforcement
- Tenant Protection and Anti-Displacement

AFFH Geographic Target Areas:

- Citywide

AFFH Outcomes:

- Begin recording hits on City website on fair housing resources in 2023.
- Promote fair housing services with the goal of increasing inquiries by 20 percent over eight years.

Program 2: City Outreach - Continue to use the City newsletter, the City website, and other outreach measures to educate the community regarding housing issues such as fair housing, accessory dwelling units, group homes, SRO developments, reasonable accommodation, assistance to the homeless, and energy conservation.

Actions and Timing:

- By July 2023, update City website to provide links to various local, state, and federal agencies and organizations that provide housing and related services and programs.
- Annually publish housing resources on City newsletter.
- As part of the survey of SRO units (see Policy 2), distribute information about housing resources for tenants.

Funding: General Fund

Monitoring: Administrative Assistant and City Manager

AFFH Themes Addressed:

- Fair Housing Outreach and Enforcement
- Tenant Protection and Anti-Displacement

AFFH Geographic Target Areas:

- Parcels with existing accessory living quarters, ADUs/JADUs, and SRO units.

AFFH Outcomes:

- Begin recording hits on City website on housing resources in 2023.
- Promote housing services with the goal of increasing inquiries by 20 percent over eight years.

Program 3: Reasonable Accommodation - Bradbury has conducted a review of the zoning regulations, building codes, and permit processing procedures, and has not identified any institutional barriers to the provision of accessible housing.

The City's Development Code includes provisions for Reasonable Accommodation Process for Disabled Persons that establish procedures for persons with disabilities, or their representatives, to request a reasonable accommodation from the City's zoning regulations, building codes, and other land use regulations, policies and procedures to enable a disabled person to have an equal opportunity to enjoy housing equal to that of non-disabled persons. This process helps facilitate housing mobility or allow persons with disabilities to age in place. However, the required findings on compatibility with neighborhood character and traffic impacts may be considered subjective.

Actions and Timing:

- By July 2023, update City website to publicize information on reasonable accommodations.
- By the end of December 2023, review and revise the required findings for the approval of a Reasonable Accommodation request to ensure that they are objective and provide certainty in outcomes.

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- Housing Mobility

AFFH Geographic Target Areas:

- Citywide.

AFFH Outcomes:

- Improve accessibility for two units over eight years.

Program 4: Housing Opportunities for Persons Living with Disabilities - The San Gabriel/Pomona Regional Center (SGPRC) provides services and support for adults and children with developmental disabilities. According to the State Department of Development Services, SGPRC was serving fewer than 11 Bradbury residents with developmental disabilities as of December 2020. All of these developmentally disabled residents are living at home. As their parents age and/or become frail, their adult disabled children may require alternative housing options or supportive services to age in place. The SGPRC has identified several community-based housing types appropriate for persons living with a developmental disability, including licensed community care facilities and group homes, supervised apartment settings with support services, and rent subsidized / affordable housing for persons able to live more independently. This resource helps facilitate housing mobility or allow persons with disabilities to age in place.

Actions and Timing:

- By July 2023, update City website to inform Bradbury families of the housing opportunities and services available for persons with developmental disabilities.
- By July 2023, amend Zoning Code to make provisions for housing for persons with disabilities (see Policy 2).

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- Housing Mobility

AFFH Geographic Target Areas:

- Citywide.

AFFH Outcomes:

- Begin recording hits on City website on housing resources in 2023.
- Promote housing services with the goal of increasing inquiries by 20 percent over eight years.

Policy 2: Promote the development of a variety of housing types and continue to identify sites that are available for new residential development.

Program 5: Site Inventory Program – For the 6th Cycle Housing Element, the City has been assigned a Regional Housing Needs Assessment of 41 units. Based on projected ADUs (8 units), single-family homes on vacant land (27 units on 17 parcels), and SRO development potential based on trend (16 units on 8 parcels), the City has adequate capacity to accommodate 51 additional units (16 lower income; 1 moderate income; and 34 above moderate income units). There remains a shortfall of 8 lower income and 7 moderate income units to be accommodated on the City’s Affordable Housing Overlay at the City Hall site.

When reviewing applications for subdivision, the City will consider a range of lot sizes, including 7,500 square foot (R-1) lots.

Actions and Timing:

- Pursuant to State law (Government Code 65583.2 (h) and (i)) regarding rezoning for adequate site, each site must permit for-sale and rental multi-family housing and the site must be adequate to permit at least 16 units on site. By July 2023, amend the Zoning Map to apply the Affordable Housing Overlay (AHO) on the City Hall site to allow up to 18 affordable units at a density of 20 to 35 units per acre, adequate to accommodate the City’s remaining lower and moderate income RHNA units. Establish appropriate development standards that would facilitate the development of affordable housing.
- Continue to maintain the sites inventory and make available on the City’s website.
- By July 2023, develop a procedure pursuant to SB 166 (No Net Loss) to monitor development in the City and progress toward meeting its RHNA to ensure the City continues to have adequate sites for its RHNA throughout the Housing Element planning period.
- By July 2023, amend the Development Code to comply with AB 1397 (By-Right Approval) to provide by-right approval of housing on the Affordable Housing Overlay site if the project includes at least 20 percent of the units as housing affordable to lower income households.
- By July 2023, amend the Development Code to comply with AB 1397 (Replacement Housing) to require, as a condition of project approval, the replacement of existing units on site that are either deed restricted or occupied by lower income households.
- Ongoing, in reviewing specific plan proposals on large privately owned vacant land (such as those large parcels listed in the Housing Element but not included in the sites inventory for RHNA purposes), the City will encourage the plans to include a variety of lot sizes to facilitate a range of housing options.

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- New Opportunities in High Resource Areas
- Housing Mobility

AFFH Geographic Target Areas:

- Large residential parcels in northern Bradbury and in AHO.

AFFH Outcomes:

- Create ADU/JADUs by eight units over eight years.
- Create SRO units by 18 units through SRO developments over eight years.
- Create affordable units in AHO by 18 units over eight years.

Program 6: Multi-Family Housing – This program is intended to complement the Site Inventory Program above, which outlines the rezoning necessary for the shortfall in sites for RHNA. To facilitate the development of a variety of housing types, including multi-family housing, the City proposes to amend the Development Code to address the following:

- Affordable Housing Overlay Zone – Amendment of Overlay Zone to include affordable multi-family housing (at a density between 20 and 35 units per acre) as an allowable use and to establish appropriate development standards for multi-family housing. As part of the amendment, setback, lot coverage, and other requirements will be adjusted to ensure buildable areas of adequate size to potentially accommodate an affordable housing project of at least 18 units and a small emergency shelter.
- SRO Developments – Amend the Development Code to require cooking facilities to be included in individual SRO units to ensure each unit is a separate and adequate dwelling unit. Increase the allowable number of SRO units in SRO developments in A-1 zone from three to four units, and in A-2 zone from five to six units. To accommodate the requirement for cooking facilities, the maximum unit size for SRO units will be increased from 250 square feet to 300 square feet. The Code will also be amended to remove the requirement of occupancy by domestic help and ranch workers. (This amendment is completed.)

This program will also work to promote new housing opportunities in high resource areas as defined by the California Tax Credit Allocation Committee (TCAC).

Actions and Timing:

- Facilitate the development of 18 SRO units through SRO developments over the Housing Element planning period by promoting the new SRO development regulations to property owners and developers.
- By July 2023, amend the Development Code to address the Affordable Housing Overlay Zone and SRO developments as outlined above. Place the Affordable Housing Overlay zone on the City Hall property.
- Beginning in 2024, conduct a survey on SRO developments every other year to ensure the development provisions are adequate and appropriate to facilitate SRO developments. If the trend of SRO developments is not consistent with the projection in the Housing Element, within one year, the City will adopt additional adjustments to further incentivize SRO units, especially if the owners agree to make the units available and affordable to extremely low income households. Alternatively by the end of 2027, the City will designate additional residential properties with an AHO.

- By the end of 2024 and annually thereafter, outreach to affordable housing developers active in the region to present the opportunity of affordable housing development in the AHO. The City plans to facilitate affordable housing development on the City Hall site via a land lease agreement and the site would be considered exempt surplus land. Other tools available to facilitate development include: State density bonus incentives. Priority processing and potential deferral of fees (pending on funding availability) will be offered if the project includes units affordable to extremely low income households and those with special needs. If an affordable housing developer is recruited between 2024 and 2026, building permits could be issued prior to the end of this Housing Element cycle.
- If by the end of 2027, no development interest is expressed for the City Hall site, the City will designate additional residential properties with an AHO. These areas are similar to the City-owned site as they are located in the most urbanized areas of the City. This timing would allow for housing construction to occur prior to the end of this Housing Element cycle.

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- New Opportunities in High Resource Areas
- Housing Mobility

AFFH Geographic Target Areas:

- Large residential parcels in northern Bradbury and in AHO.

AFFH Outcomes:

- Create SRO units by 18 units through SRO developments over eight years.
- Create affordable units in AHO by 18 units over eight years.

Program 7: Procedures and Zoning Code Provisions for Affordable Housing and Special Needs Households – The City will amend the Development Code and development procedures to address housing options for persons with special needs as well as to expand affordable housing opportunities. These include:

- Emergency Shelters – The parking standards outlined in the Development Code do not comply with AB 139. (Given that the City has not designated other sites beside the City Hall site for emergency shelter, separation requirement is not applicable. The City also has not established a bed limit for the shelter overlay.)
- Employee Housing - Many of the estates in Bradbury operate equestrian ranches and/or orchards and provide housing for the permanent farm workers employed on site. Currently, such housing can be provided as individual single room occupancy (SRO) units or multi-unit SRO buildings, bunk houses, or accessory dwelling units. The City will review its development standards and processing procedures for small employee housing for consistency with the Employee Housing Act and amend the Development Code as appropriate.

- Residential Care Facilities – The City allows residential care facilities for seven or more persons in most residential zones via the approval of a Conditional Use Permit (CUP). The City will allow residential care facilities for seven or more in all residential zones and review and revise the conditions for approval to ensure they are objective and provide certainty and consistency in outcomes.
- Density Bonus – Amend the Development Code to establish density bonus provisions consistent with the State Density Bonus law.
- Transitional/Supportive Housing and Low Barrier Navigation Center (LBNC) – Amend the Development Code to add transitional/supportive housing and LBNC as permitted uses in the AHO. Transitional and supportive housing is considered regular residential use to be similarly permitted as similar residential uses in the same zone. Supportive housing meeting the specific requirements established in AB 2162 will be permitted by right without discretionary review where multi-family housing or mixed use is permitted. If the project is located within 0.5 mile from transit, then no minimum parking can be required.
- Definition of Family – Amend the Development Code to remove the requirement for “a common housekeeping management plan based on an intentionally structured relationship providing organization and stability.”
- By the end of December 2023, establish written procedures for the streamlined ministerial approval process pursuant to SB 35.

Actions and Timing:

- By July 2023, amend the Development Code to address emergency shelters, employee housing, residential care facilities for seven or more persons, density bonus provisions, transitional/supportive housing, low barrier navigation centers, and definition of family, and

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- Housing Mobility

AFFH Geographic Target Areas:

- In AHO.

AFFH Outcomes:

- Create affordable units in AHO by 18 units over eight years.

Policy 3: Continue to encourage housing for lower (including extremely low) and moderate income households through the preservation and development of accessory dwellings units (ADUs)/junior ADUs, and SRO developments.

Program 8: Accessory Dwelling Unit (ADU)/Junior ADU - In compliance with recent changes in State law, and as a means of facilitating the provision of smaller, more affordable accessory units, the City amended the Development Code in 2021 to permit ADU and Fire Zone ADU (FZADU) and Junior ADU (JADU) in all residential zones. The City will develop incentives to facilitate the development of these various types of ADUs.

Actions and Timing:

- Facilitate the development of eight ADUs/JADUs over Housing Element planning period.
- By July 2023, amend the ADU ordinance to address comments from the State HCD to comply with State law.
- By the end of 2023, develop pre-approved plans for detached ADUs to streamline approval.
- By the end of 2023, update the City website to include resources to assist in ADU development.
- By the end of 2023, create an ADU handout that includes information on standards for the variety of accessory living quarters permitted in the City.
- Conduct a survey on ADUs/JADUs every other year to monitor development trends, and if by the end of 2025 and by the end of 2027 trends are below that projected in this Housing Element, within one year develop additional incentives or strategies to encourage ADU/JADU production.

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- Housing Mobility

AFFH Geographic Target Areas:

- Large residential parcels in northern Bradbury.

AFFH Outcomes:

- Create ADU/JADUs by eight units over eight years.

Policy 4: Continue to work to remove governmental constraints that limit or discourage the development of new housing in the City.

Program 9: Development Streamlining Program - The City will continue to implement streamlined permit processing in the City, and has developed a "Building 101" handout to provide clear information to development applicants. Staff will continue to process small single-story dwellings and additions that comply with City zoning regulations without requiring Planning Commission review. This process significantly reduces development processing time.

Actions and Timing:

- Ongoing monitoring of development process and procedures.

Funding: General Fund

Monitoring: City Planner and City Manager

Program 10: Conditions for Neighborhood Compatibility Review - Development of any accessory living quarter (SRO developments and guest houses), and larger projects over 1,000 square feet requires neighborhood compatibility review through the Architectural Review process. In addition to the standard findings for Architectural Review, approval of accessory living quarters requires additional findings that may not meet SB 330 objective development standard requirements.

Actions and Timing:

- By July 2023, review and revise the findings for Architectural Review for general projects over 1,000 square feet and for the approval of accessory living quarter; remove findings regarding neighborhood compatibility that may be considered subjective and replace with findings that are objective and facilitate certainty in outcomes.

Funding: General Fund

Monitoring: City Planner and City Manager

AFFH Themes Addressed:

- New Opportunities in High Resource Areas
- Housing Mobility

AFFH Geographic Target Areas:

- Large residential parcels in northern Bradbury and in AHO.

AFFH Outcomes:

- Create ADU/JADUs by eight units over eight years.
- Create SRO units by 18 units through SRO developments over eight years.
- Create affordable units in AHO by 18 units over eight years.

Policy 5: Work to conserve and improve the existing housing (including affordable housing) in the City.

Program 11: Code Enforcement Program - The City will continue to use code enforcement measures where required to ensure that the existing housing stock in the City is maintained and preserved in a safe and sanitary condition.

Actions and Timing:

- Facilitate the rehabilitation of eight units (including accessory living quarters, ADUs/JADUs, and SRO units) to comply with current housing and zoning codes.

Funding: General Fund

Monitoring: City Manager

AFFH Themes Addressed:

- Place-Based Strategies for Neighborhood Improvements

AFFH Geographic Target Areas:

- Parcels with existing accessory living quarters, ADUs/JADUs, and SRO units.

AFFH Outcomes:

- Facilitate the rehabilitation of eight housing units over eight years.

Program 12: Historic Preservation Program and Mills Act - The City will continue to implement its historic preservation and Mills Act programs to offer property tax relief as an incentive to preserve, restore, rehabilitate, and maintain historic resources in the community.

Actions and Timing:

- By July 2023, update City website to promote Mills Act incentives.
- Conserve the eight historically significant residential structures identified in the City's 2012-2030 General Plan, and encourage property owners to pursue listing as a qualified historic property and to utilize the associated Mills Act incentives for preservation.

Funding: General Fund

Monitoring: City Planner

AFFH Themes Addressed:

- Place-Based Strategies for Neighborhood Improvements

AFFH Geographic Target Areas:

- Parcels with historic homes.

AFFH Outcomes:

- Facilitate the conservation of eight housing units over eight years.

Policy 6: Assist and address the needs of the homeless.

Program 13: Homeless Outreach and Supportive Services - The City will work with social service agencies providing services to homeless persons/families. The City of Bradbury periodically provides financial assistance to shelters in the surrounding area that provide housing and assistance to the homeless. The City will continue to support agencies that serve the homeless and other special needs populations, such as persons with disabilities, subject to funding availability.

Actions and Timing:

- Annually review funding allocation to nonprofits as part of the City's annual budget process.

Funding: General Fund

Monitoring: Administrative Assistant

Policy 7: Promote and encourage energy conservation and affordable housing.

Program 14: Energy Conservation Program – The City will provide informational materials on green building techniques and materials and will provide data to property owners and builders. The City will work with the San Gabriel Valley Council of Governments, the San Gabriel Valley Energy Wise Partnership, and others in implementation of its Climate Action Plan, and will report annually on its progress.

Actions and Timing:

- Annual Reporting to Council on GHG emission targets.
- By the end of 2023, create a Green Building Handout for property owners and developers. Handout will be available through the City's website.

Funding: General Fund

Monitoring: City Planner

B. Quantified Objectives

The following Table VI-1 summarizes Bradbury's quantified objectives for the 2021-2029 Housing Element planning period:

**TABLE VI-1
QUANTIFIED HOUSING UNIT DEVELOPMENT OBJECTIVES 2021-2029**

Income Level	New Construction	Rehabilitation	Conservation
Extremely Low	8	<u>1</u>	<u>1</u>
Very Low	8	<u>1</u>	<u>1</u>
Low	9	<u>1</u>	<u>1</u>
Moderate	9	<u>1</u>	<u>1</u>
Above Moderate	7	4	4
TOTALS	41	<u>8</u>	<u>8</u>

New Construction - An average of two single-family homes and one second unit per year.

Rehabilitation - Units rehabilitated due to Code Enforcement efforts, including accessory living quarters, ADUs/JADUs, and SRO units

Conservation - Preservation of historic properties through policies and Mills Act contracts.



Housing Element 2021-2029

APPENDIX A

PUBLIC OUTREACH

The City of Bradbury began the Housing Element update process in Spring 2021. The City held two Housing Element Study Sessions with City Council addressing the following topics:

- April 20, 2021: Introduction to the Housing Element Update process, requirements, RHNA, and possible strategies to meet RHNA.
- March 7, 2022: Review strategy to meet RHNA, especially lower income units, revisions to the Development Code to comply with State law, and provisions for single-room occupancy (SRO) units and SRO developments.

In addition, the City has conducted discussions with the City Council on various housing topics:

- March 1, 2021 – Kickoff of Housing Element update and potential challenges
- February 7, 2022 – Re-initiation of the Housing Element update after delays due to staffing constraints

Pursuant Governor Newsom’s Executive Order N-20-20, meetings were held virtually via zoom. Both meetings were held in the evening and conducted in English.

In addition to announcing the meeting on the City’s website, a special flyer was prepared and sent to agencies and organizations that serve special needs populations in the region, market-rate and affordable housing developers in the region, and agencies/individuals that have provided comments to the City’s Housing Element update. A list of the stakeholders is found in the next page.

During the various public meetings, the public has expressed concerns regarding the City’s ability to accommodate additional housing given its unique characteristics. In response to these concerns while addressing Housing Element requirements, the City is proposing to revise the provisions for SRO housing (to require cooking facilities and therefore can function as an adequate living unit) and to amend the Affordable Housing Overlay to permit multi-family affordable housing development. The City of Bradbury offered opportunities for the public to comment on housing-related issues and on the Draft 2021-2029 Housing Element.

The Draft Housing Element was made available for Public Review from April 29, 2022 to May 30, 2022. Notices were sent to stakeholders to inform them (see below). The City received a

Public Comment Letter on May 31, 2022 from Californians for Homeownership. The City sent a direct response to the commenter.

Figure A- 1: Notice of Preparation of the 2021-2029 Housing Element (April 7, 2021)

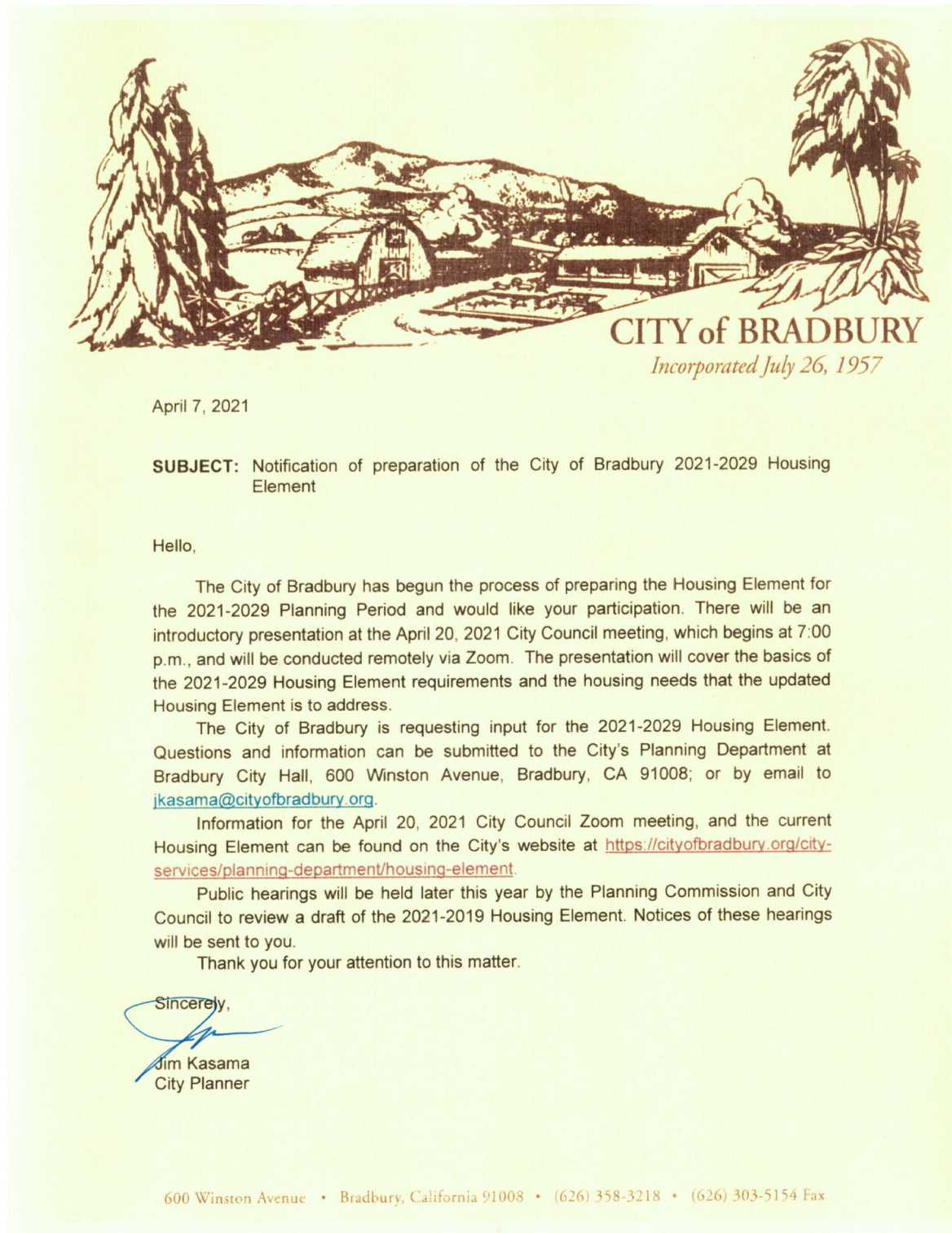


Figure A- 2: Notice of Public Review Period for the Draft Housing Element (April 29, 2022)**Elected Officials**

Mayor
Elizabeth Bruny, District 5

Mayor Pro-Tem
Bruce Laubrop, District 4

Councilmember
Richard G. Barakat, District 3

Councilmember
Richard T. Hale, Jr., District 1

Councilmember
D. Montgomery Lewis, District 2

Staff

City Manager
Kevin Kearney

City Clerk
Claudia Saldana

Management Analyst
Sophia Musa

City Attorney
Cary Reisman

Building Inspector
Mark Handler

City Engineer
David Gilbertson

City Planner
Jim Kasama

Finance Director
Suresh Malkani

April 29, 2022

RE: PUBLIC COMMENT PERIOD FOR THE CITY OF BRADBURY'S HOUSING ELEMENT

Dear Stakeholder:

The City of Bradbury ("City") has drafted its sixth cycle Housing Element ("HE") for public review and comment. The City's draft HE can be viewed by visiting the City's website at:

https://www.cityofbradbury.org/services/planning_department/housing_element.php
The draft HE is available for public comment and for the next 30 days ending on Monday, May 23, 2022 at 5:00pm. Comments can be submitted via email to Kevin Kearney, City Manager, at kkearney@cityofbradbury.org or via mail to:

Bradbury City Hall
ATTN: Kevin Kearney, City Manager
600 Winston Avenue
Bradbury, CA 91008

For additional information and/or questions, please contact Jim Kasama by phone at (626) 358-3218 or by email at jkasama@cityofbradbury.org

Sincerely,

Kevin Kearney
City Manager

Figure A- 3: Draft Housing Element Availability in City's Website

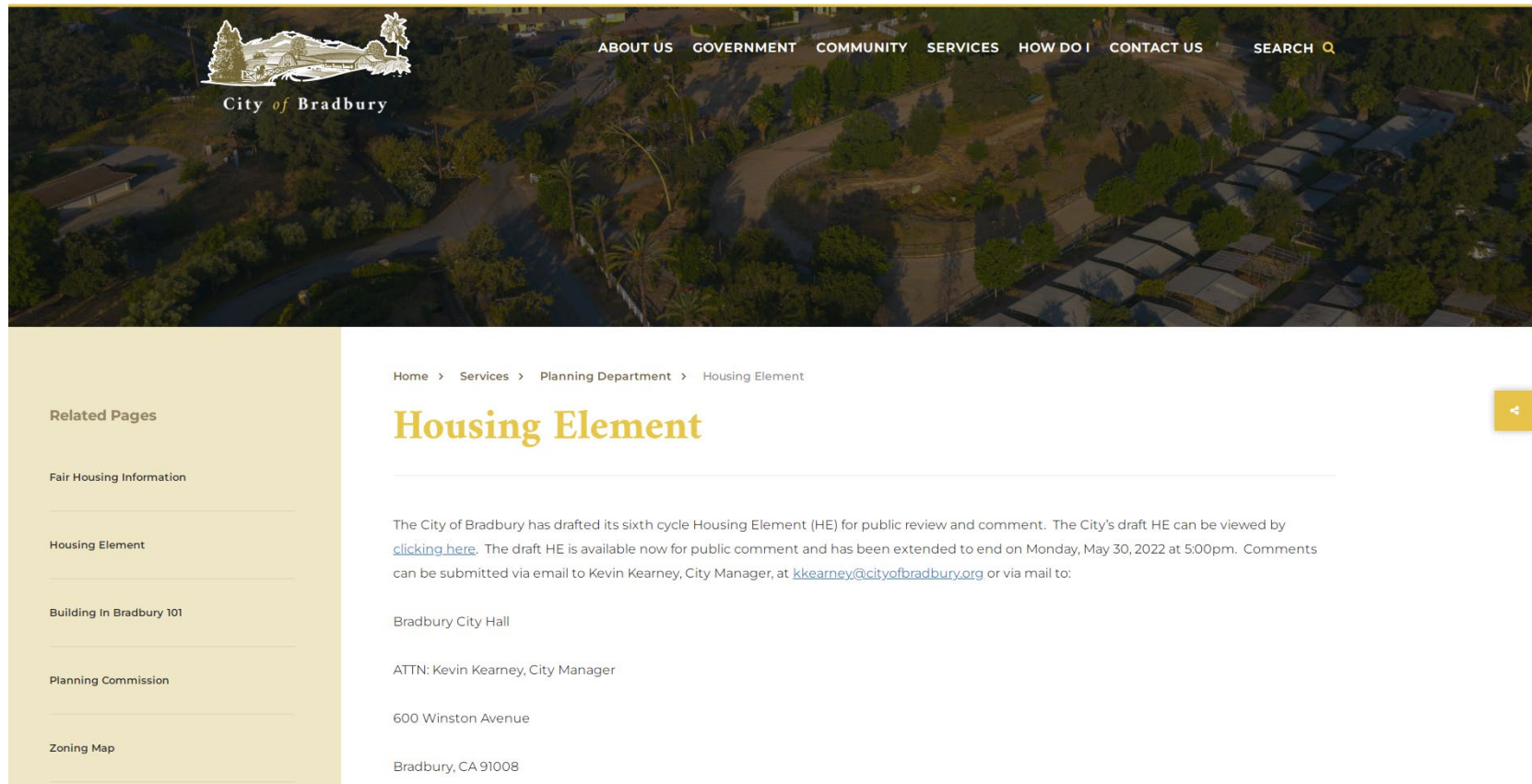


Figure A- 4: Stakeholder List

San Gabriel Valley Habitat for Humanity
724 E. Huntington Drive
Monrovia, CA 91016

Santa Anita Family Services
605 S. Myrtle Avenue
Monrovia, CA 91016

Southern California Presbyterian Homes
516 Burchett Street
Glendale, CA 91203

San Gabriel Valley/Pomona Regional Center
75 Rancho Camino Drive
Pomona, CA 91766

Abode Communities
1149 S. Hill Street, Suite 700
Los Angeles, CA 90015

Ability First
1300 Green Street
Pasadena, CA 91106

Mercy Housing
1500 S. Grand Avenue, Suite 100
Los Angeles, CA 90015

Royal Oaks
1763 Royal Oaks Drive North
Bradbury, CA 91010

National CORE
Hope Through Housing Foundation
9421 Haven Avenue
Rancho Cucamonga, CA 91730

Foothill Unity Center, Inc.
790 W. Chestnut Avenue
Monrovia, CA 91016

Heritage Housing Partners
608 N. Fair Oaks Avenue, #126
Pasadena, CA 91103

Union Station Homeless Services
825 E. Orange Grove Blvd.
Pasadena, CA 91104

Jamboree Housing Corporation
17701 Cowan Avenue, Suite 200
Irvine, CA 92614

Friends In Deed
P.O. Box 41125
Pasadena, CA 91114-8125

Santa Teresita, Inc.
816 Buena Vista Street
Duarte, CA 91010

Meals on Wheels
Volunteer Center of the San Gabriel Valley
119 W. Palm Avenue
Monrovia, CA 91016

Meals on Wheels
Duarte Senior Center
1610 Huntington Drive
Duarte, CA 91010

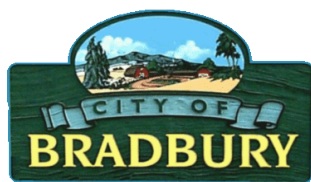
City of Duarte
1600 Huntington Drive
Duarte, CA 91010

City of Monrovia
415 S. Ivy Avenue
Monrovia, CA 91016

Gabrielino – Tongva Tribe
Attn: Sam Dunlap
tongvactr@gmail.com

City Ventures
Attn: Briggs D'Eliscu
Briggs@CityVentures.com

Matthew Gelfand
Californians for Homeownership
525 S. Virgil Avenue
Los Angeles, CA 90020



Housing Element 2021-2029

APPENDIX B

AFFIRMATIVELY FURTHERING FAIR HOUSING

A. Introduction and Overview of AB 686

In 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction’s fair housing enforcement and outreach capacity;
- An analysis of segregation patterns, racially/ethnically concentrated areas of poverty, disparities in access to opportunities, and disproportionate housing needs;
- An assessment of contributing factors; and
- An identification of fair housing goals and actions.

The AFFH rule was originally a federal requirement applicable to entitlement jurisdictions, those with populations over 50,000 that can receive HUD Community Planning and Development (CPD) funds directly from HUD. Before the 2016 federal rule was repealed in 2019, entitlement jurisdictions were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI). AB 686 states that jurisdictions can incorporate findings from either report into the Housing Element.

This analysis of fair housing issues in the City of Bradbury relies on the 2021 Pre-Certified Local Housing Data for the City prepared by the Southern California Association of Governments (SCAG), the 2019 Local Profiles Report prepared by SCAG, the 2018 Analysis of Impediments to Fair Housing Choice (2018 AI) prepared by the Los Angeles Community Development

Authority (LACDA), California Department of Housing and Community Development (HCD) AFFH Data Viewer mapping tool, 2015-2019 American Community Survey (ACS), HUD Comprehensive Housing Affordability Strategy (CHAS) data, HUD AFFH data, and additional local sources of information.

B. Overview of Bradbury

Demographic and Housing Summary

The City of Bradbury is a small, residential/equestrian-orientated community of less than 1,000 residents nestled at the base of the San Gabriel Mountains below Angeles National Forest in Los Angeles County. Incorporated since July 26, 1957, the City is a true "contract city." The community encompasses 1.9 square miles, and includes 3.2 miles of public streets and roads. Bradbury is bordered on the west by the City of Monrovia, on the south and east by the City of Duarte.

In 2020, the City had a population of 833 persons. Of this total, 398 are males (47.8 percent), and 435 (52.2 percent) are females and a median age of 46.2 years. This figure is significantly higher than the Los Angeles County median age of 36.5 years (2015-2019 ACS). In the 53 years between incorporation and the 2015-2019 ACS, the City's population grew by 315 individuals to a total of 833 persons, or an increase of 60.8 percent.

The City has a diverse population, with Whites being the largest group (45.1 percent), but also has a significant share of Asian/Pacific Islander residents (37.5 percent) and Hispanic residents (14.9 percent). The City also has one of the highest median incomes of the area San Gabriel region and more than twice the County's median income. [Figure 1](#) shows a demographic summary of the City compared to Los Angeles County and the SCAG region as presented in the SCAG's 2019 Local Profiles Report for the City.

The vast majority (97 percent) of the housing in the City are single-family, detached units. In fact, over the past two decades, there has only been nine new multi-family residential units added to the City's stock, compared to 35 single-family residential. Like the rest of California, home prices have increased significantly in the past 20 years. Between 2000 and 2018, median home sales prices in Bradbury increased 82 percent from 743,000 in 2000 to 1\$.34 million in 2018.¹ Prices in Bradbury have ranged from a low of 158.2 percent of the SCAG region median in 2007 and a high of 725.3 in 2009, but are consistently higher than Los Angeles County and the SCAG region.

¹ 2021 Pre-Certified Local Housing Data, SCAG

Figure 1: 2018 Demographic and Housing Comparisons- Bradbury, LA County, and SCAG

2018 STATISTICAL SUMMARY				
<i>Category</i>	<i>Bradbury</i>	<i>Los Angeles County</i>	<i>Bradbury Relative to Los Angeles County*</i>	<i>SCAG Region</i>
2018 Total Population	1,069	10,283,729	[0.01%]	19,145,421
2018 Population Density (Persons per Square Mile)	545	2,518	-1,973	494
2018 Median Age (Years)	46.9	36.0	10.9	35.8
2018 Hispanic	11.9%	48.4%	-36.5%	46.5%
2018 Non-Hispanic White	40.7%	26.5%	14.2%	31.4%
2018 Non-Hispanic Asian	44.3%	14.3%	30.0%	12.8%
2018 Non-Hispanic Black	1.6%	7.9%	-6.3%	6.3%
2018 Non-Hispanic American Indian or Alaska Native	0.2%	0.2%	0.0%	0.2%
2018 All Other Non-Hispanic	1.3%	2.7%	-1.4%	2.8%
2018 Number of Households	354	3,338,658	[0.01%]	6,132,938
2018 Average Household Size	3.0	3.0	0.0	3.1
2018 Median Household Income	\$150,119	\$61,015	89,104	\$64,989
2018 Number of Housing Units	409	3,546,863	[0.01%]	6,629,879
2018 Homeownership Rate	78.3%	52.4%	25.9%	52.4%
2018 Median Existing Home Sales Price	\$1,355,000	\$597,500	757,500	\$561,000
2017 - 2018 Median Home Sales Price Change	-2.9%	6.7%	-9.6%	6.5%
2018 Drive Alone to Work	74.0%	73.7%	0.3%	75.8%
2018 Mean Travel Time to Work (minutes)	36.1	30.9	5.2	30.2
2017 Number of Jobs	153	4,767,204	[0.003%]	8,465,304
2016 - 2017 Total Jobs Change	1	23,801	[0.003%]	76,197
2017 Average Salary per Job	\$49,874	\$66,037	-16,163	\$60,956
2018 K-12 Public School Student Enrollment	757	1,482,258	[0.1%]	2,975,283

Sources: U.S. Census American Community Survey, 2017; Nielsen Co.; California Department of Finance E-5, May 2018; CoreLogic/DataQuick; California Department of Education; and SCAG

* Numbers with [] represent Bradbury's share of Los Angeles County. The unbracketed numbers represent the difference between Bradbury and Los Angeles County.

Mapped jurisdictional boundaries are as of July 1, 2016 and are for visual purposes only. Report data, however, are updated according to their respective sources.

Source: 2019 Local Profiles Report- City of Bradbury. SCAG.

Bradbury Geography

The City of Bradbury is made up of one Census Tract (4302.00) and one block group. Fair housing analysis is provided at the Tract level in the subsequent sections of this AFFH analysis.

C. Assessment of Fair Housing Issues

1. Fair Housing Enforcement and Outreach

Federal fair housing laws prohibit discrimination based on: race, color, religion, national origin, sex/gender, handicap/disability, and familial status. Specific federal legislation and court rulings include:

- **The Civil Rights Act of 1866-** covers only race and was the first legislation of its kind
- **The Federal Fair Housing Act 1968-** covers refusal to rent, sell, or finance
- **The Fair Housing Amendment Act of 1988-** added the protected classes of handicap and familial status
- **The Americans with Disabilities Act (ADA)-** covers public accommodations in both businesses and in multi-family housing developments
- **Shelly v. Kramer 1948-** made it unconstitutional to use deed restrictions to exclude individuals from housing
- **Jones v. Mayer 1968-** made restrictive covenants illegal and unenforceable

California state fair housing laws protect the same classes as the federal laws with the addition of marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination. Specific State legislation and regulations include:

- **Unruh Civil Rights Act-** extends to businesses and covers age and arbitrary discrimination
- **California Fair Employment and Housing Act (Rumford Act)-** covers the area of employment and housing, with the exception of single-family houses with no more than one roomer/boarder
- **California Civil Code Section 53-** takes measures against restrictive covenants
- **Department of Real Estate Commissioner's Regulations 2780-2782-** defines disciplinary actions for discrimination, prohibits panic selling and affirms the broker's duty to supervise
- **Business and Professions Code-** covers people who hold licenses, including real estate agents, brokers, and loan officers.

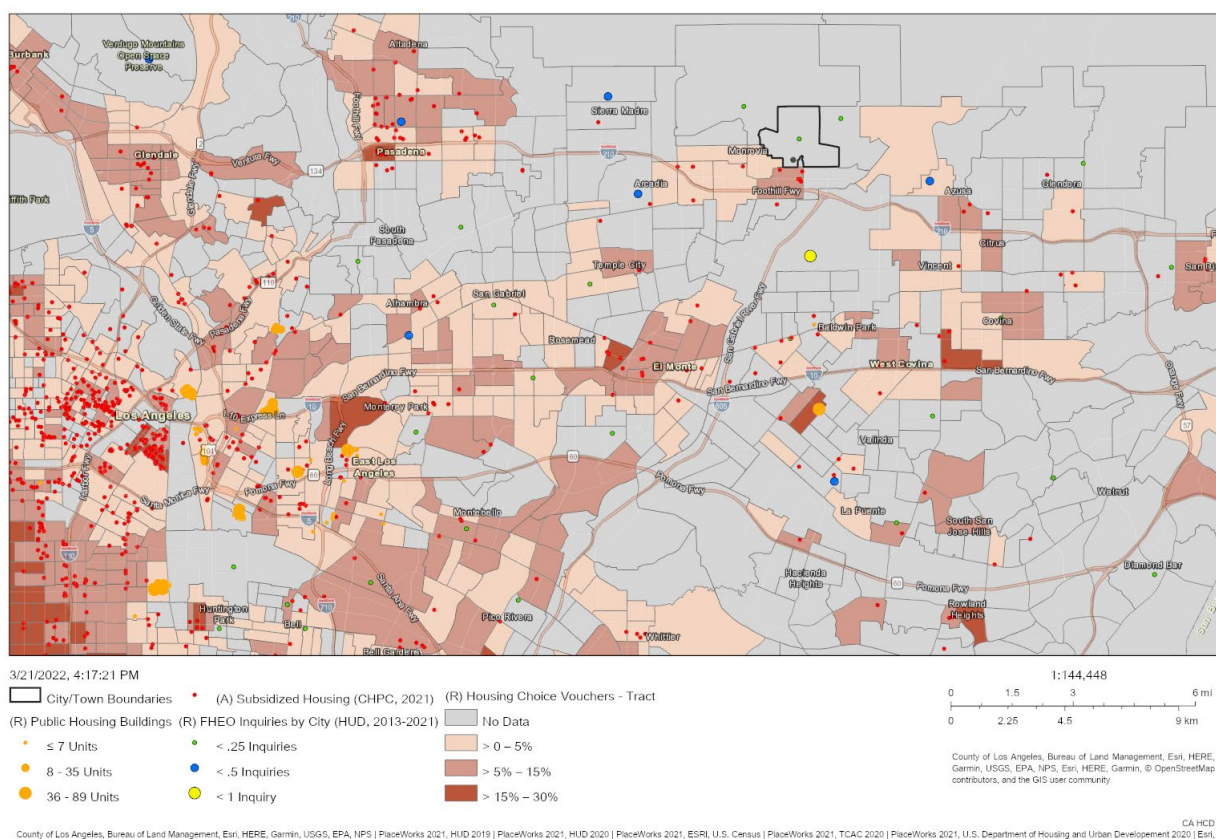
The City works to comply with applicable federal and State fair housing laws and to ensure that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status, or sex. Further, the Los Angeles County Development Authority (LACDA) prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex.

Regional Trend

According to HUD's Office of Fair Housing and Equal Opportunity (FHEO) records, 130 housing discrimination cases were filed in Los Angeles County in 2020, compared to 291 in 2010. In 2020, a majority of cases were related to disability (66 percent). Another 21 percent of cases were related to racial bias. The percent of cases related to disability has increased significantly since 2010, when only 36 percent of cases reported a disability bias.

FHEO² inquires by City, public housing buildings, subsidized housing units and housing choice voucher (HCV) households by tract are shown in [Figure 2](#). In the San Gabriel Valley and region surrounding Bradbury, the most common frequency of fair housing inquiries was <.25 inquiries per 1,000 persons, with Irwindale having the highest frequency at 0.69 inquiries per 1,000 persons. Subsidized housing units are concentrated south and west of Bradbury in Pasadena and the City of Los Angeles while public housing buildings are mostly concentrated in the area between the City of Los Angeles and East Los Angeles. HCVs are most concentrated in similar areas including Pasadena, San Gabriel, Monterrey Park, and the City of Los Angeles.

Figure 2: Regional Public Housing Buildings, Subsidized Housing, FHEO Inquiries, and HCV Use



Source: HCD Data Viewer, HUD 2013-2021, 2021.

² Fair Housing and Equal Opportunity (FHEO). Inquires span from 01/01/2013 - 03/19/2021.

The Housing Rights Center (HRC), under contract with the Community Development Authority of the County of Los Angeles (CDC) Community Development Block Grant (CDBG) Urban County Program, provides fair housing services to City residents, other County entitlement jurisdictions, and Los Angeles Urban County Area. HRC is a non-profit agency whose mission is to actively support and promote fair housing through education and advocacy. The services provided by HRC include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. The materials are made available free to the public in several different languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian. Depending on the audience, the presentations can be translated by staff into Armenian, Mandarin, Spanish, or Russian. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

In FY 2019-2020, HRC received 2,038 calls for general housing inquiries and 356 calls related to fair housing inquiries. Among the 356 inquires, fair housing issues relating to disabilities (physical and mental) represented the majority (82 percent) of the protected classifications. Trailing distantly behind was source of income at five percent of the inquiries.

During FY 2019-2020, 83 fair cases were opened, with the majority being reconciled or withdrawn. Two cases were referred to litigation and three cases were referred to the Department of Fair Employment and Housing (DFEH). Among the 83 cases opened, physical disability (47 percent), mental disability (22 percent), and source of income (19 percent) represented the majority of the protected classes.

Annually, HRC conducts outreach and education throughout the Los Angeles Urban County. The HRC organizes an annual fair housing conference and resource fair for housing providers and advocates. Housing rights workshops are offered to landlords, property managers, and community members. Information on federal and state fair housing laws, common forms of housing discrimination, protected characteristics, unlawful practices, and fair housing liability is presented to workshop participants. Bilingual media outlets (primarily English and Spanish) and social media platforms are used to promote the conference and scheduled workshops and to provide general information on fair housing. In addition, HRC has a permanent Free Weekly Workshops currently being conducted online which include a Facebook Live Q&A (Mondays) and COVID-19 Tenant Protection Updates (Fridays). Residents can register for the workshops at: <https://www.housingrightscenter.org/fair-housing-education>

Information on rental housing options gathered from various classified and rental property sources is published on HRC's website on a monthly basis and distributed to the public and to social services representatives throughout the County. Individual assistance is provided to Los Angeles County landlords and renters, many of whom are low- and moderate-income, seeking information on a variety of general housing topics. Typical activities include Public Service

Announcements/media/advertisements; community presentations; literature distribution; and management trainings.

For federally funded Urban County programs, the County has committed to complying with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), or sex. LACDA prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex. Furthermore, the HRC, under contract with LACDA, monitors fair housing compliance for both state and federal fair housing laws.

Local Trend

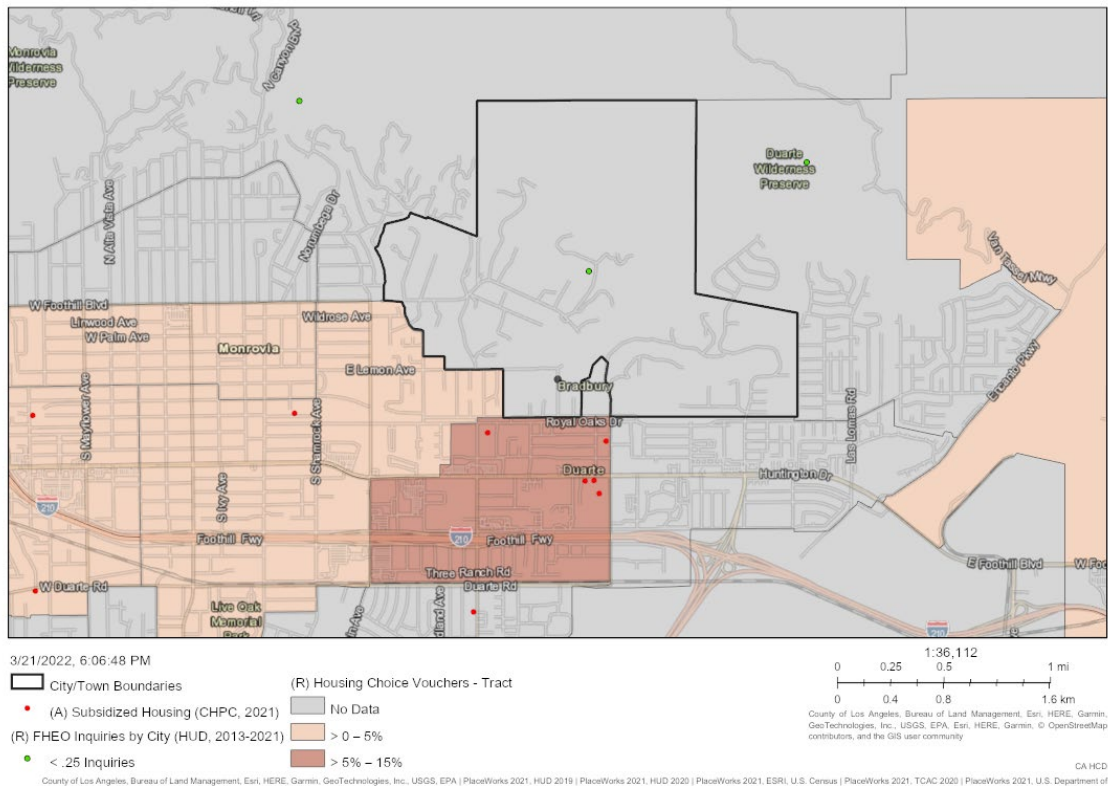
Housing Rights Center (HRC) provides Bradbury residents with fair housing education and counselling services. As explained above, HRC conducts weekly online workshops and organizes an annual fair housing conference and resource fair for housing providers and advocates. The effectiveness of these outreach efforts could not be determined for this AFFH. The City has Fair Housing Information on its website³ though it only directs residents to HUD's complaint process and fair housing information.

While no City-level data was available from the HRC on fair housing inquiries and complaints, HUD reported that Bradbury received zero FHEO inquiries between January 2013 and March 2021 (shown as less than 0.25 0.42 inquiries per 1,000 people in [Figure 3](#)). There are also no public housing building, subsidized housing units, or HCV users⁴ in the City of Bradbury. Tracts with higher concentrations of renters receiving HCVs are found south of Bradbury in Monrovia and Duarte. In addition there are no records of fair housing testing for the City.

³ https://www.cityofbradbury.org/services/planning_department/fair_housing_information.php

⁴ To protect the confidentiality of renters receiving HCVs, tracts containing 10 or fewer voucher holders have been omitted from this dataset. So it may be that less than 10 HCV renters reside in the Bradbury census tract.

Figure 3: Public Housing Buildings, FHEO Inquiries, and HCVs



Source: HCD Data Viewer, HUD 2013-2021, 2021.

Community Participation Process

The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community. AB 686 reinforces and builds on this requirement. Under AB 686 and changes to Housing Element Law, the element must describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.

The preparation of the Housing Element included a kickoff workshop held at a City Council Meeting on April 20, 2021 and another City Council workshop on March 7, 2022 to discuss the City's strategy to meet RHNA and the Development Code amendments needed to comply with State law. The City mailed an interested party list a notification of the workshops as well as advertised the workshops in the City website.

Summary of Fair Housing Issues: Fair Housing Enforcement and Outreach

The City did not have any fair housing complains or housing choice voucher users according to the most recent data posted in HCD's AFFH Data Viewer. There are also no records of fair housing testing during the 6th Cycle planning period. The City does appear to be lacking in its outreach efforts- both in disseminating fair housing services and in engaging the public during the Housing Element Process.

2. *Integration and Segregation*

Race and Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility.

The following analysis of racial/ethnic segregation also includes racial/ethnic minority population trends, maps of minority concentrated areas over time, and an analysis of the City's sites inventory as it relates to minority (non-White) concentrated areas.

Regional Trend

As shown in [Table 1](#), racial/ethnic minority groups make up 73.8 percent of the Los Angeles County population. Nearly half of the Los Angeles County population is Hispanic/Latino (48.5 percent), 26.2 percent of the population is White, 14.4 percent is Asian, and 7.8 percent is Black/African American. Bradbury adjacent jurisdictions-Azusa, Duarte, and Monrovia- have racial/ethnic minority (non-White) populations similar the Countywide average. However, unlike its neighbors and the County, Bradbury's Hispanic population is only 15 percent. Of the selected neighboring jurisdictions, Azusa has the largest racial/ethnic minority population (63.1 percent), and Monrovia has the smallest (41.1 percent).

Table 1: Racial/Ethnic Composition – L.A. County, Bradbury, and Neighboring Cities

	LA County	Bradbury	Azusa	Duarte	Monrovia
White	26.2%	45.1%	19.1%	24.7%	34.5%
Black/ African American	7.8%	1.0%	3.2%	5.5%	5.3%
American Indian/ Alaska Native	0.2%	0.0%	0.2%	0.5%	0.0%
Asian	14.4%	37.5%	12.4%	17.1%	14.7%
Native Hawaiian/ Pacific Islander	0.2%	0.0%	0.1%	0.1%	1.2%
Other ¹	2.6%	1.6%	2.0%	2.3%	3.2%
Hispanic/Latino	48.5%	14.9%	63.1%	49.9%	41.1%
Notes: 1. Some other race alone and two two more races. Source: ACS 2015-2019 (5-Year Estimates).					

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices are used to measure the evenness with which two groups (frequently defined on racial or ethnic characteristics) are distributed across the geographic units, such as block groups within a community. The index ranges from zero 0 to 100, with zero denoting no segregation and 100 indicating complete segregation between the two groups. The index score can be understood as the percentage of one of the two groups that would need to move to produce an even distribution of racial/ethnic groups within the specified area. For example, if an index score above 60, 60 percent

of people in the specified area would need to move to eliminate segregation. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

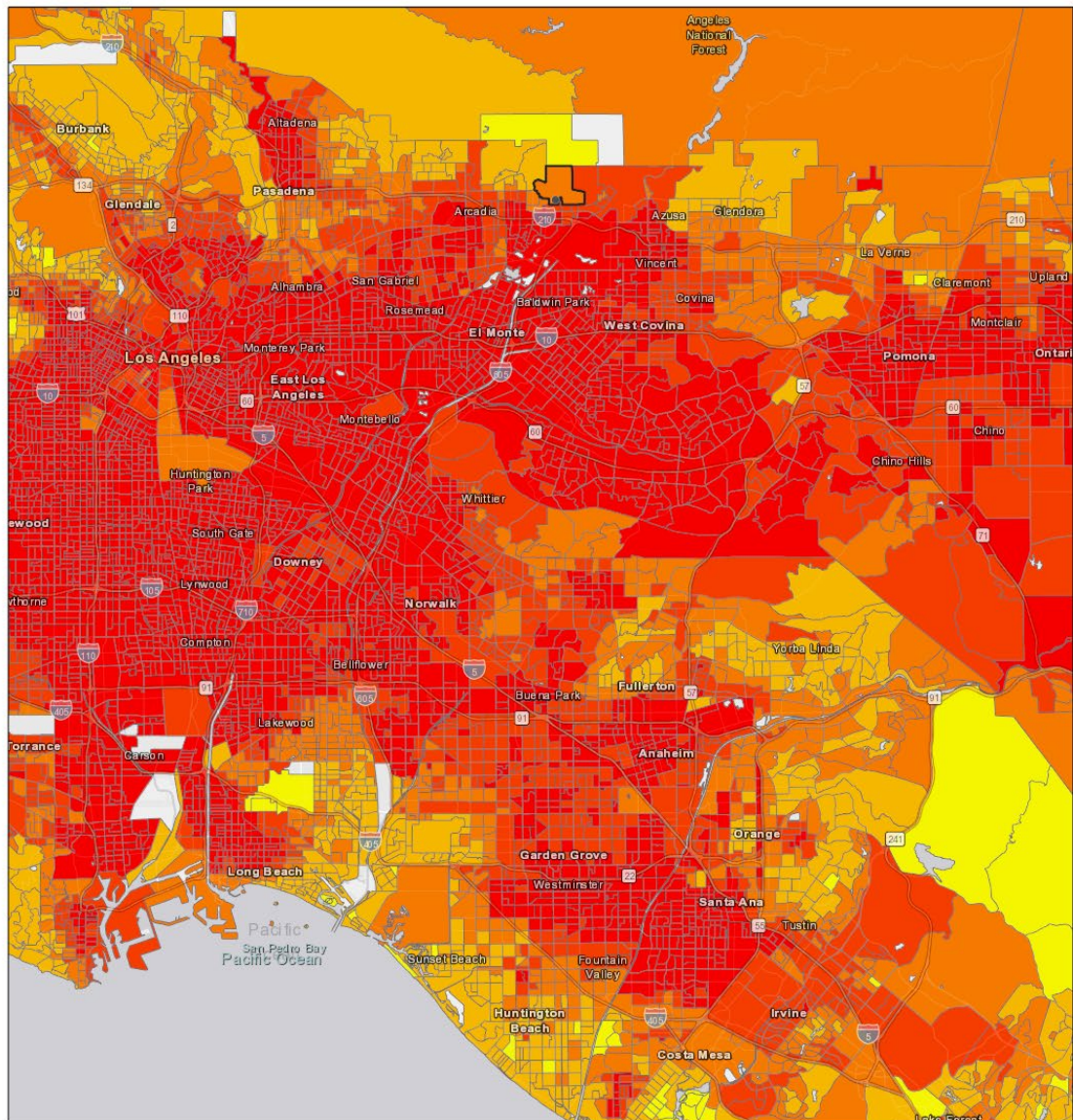
Dissimilarity indices for Los Angeles County are shown in [Table 2](#) . Dissimilarity indices between non-White and White groups indicate that the County has become increasingly segregated since 1990. Segregation between Black and White communities has decreased, while segregation between Hispanic and Asian/Pacific Islander communities and White communities has increased. According to HUD’s thresholds, all White and non-White communities in Los Angeles County are highly segregated.

Table 2: Racial/Ethnic Dissimilarity Trends – Los Angeles County

	1990	2000	2010	2020
Non-White/White	56.66	56.72	56.55	58.53
Black/White	73.04	67.40	64.99	68.24
Hispanic/White	60.88	63.03	63.35	64.33
Asian or Pacific Islander/White	46.13	48.19	47.62	51.59
Source: U.S. Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing (AFFH) Database, 2020.				

Figure 4 shows that most areas in Los Angeles County have high concentrations of racial/ethnic minorities. Coastal cities, including Santa Monica and Redondo Beach, and the areas surrounding Beverly Hills, West Hollywood, Burbank, and the Pacific Palisades neighborhood generally have smaller non-White populations. Most block groups in the South Bay, San Gabriel Valley, San Fernando Valley and central Los Angeles areas have majority racial/ethnic minority populations. Bradbury's racial/ethnic minority populations are smaller than surrounding jurisdictions. Communities east of Bradbury, such as Glendora and La Verne, also have fewer racial/ethnic minorities.

Figure 4: Regional Racial/Ethnic Minority Concentrations (2018)



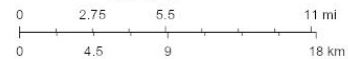
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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group



1:288,895



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD

County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD AFFH Data Viewer, 2021.

Local Trend

According to the 2015-2019 ACS, 55 percent of the Bradbury's population belongs to a racial or ethnic minority group, a slight increase from 51 percent during the 2006-2010 ACS ([Table 3](#)). In comparison, 73.8 percent of Los Angeles County residents belong to a racial or ethnic minority group in 2019. Asian (37.5 percent) and Hispanic (14.9 percent) populations make up most of the minority population in Bradbury. Bradbury also has one of the highest concentrations of Asian populations compared to its neighbors and Countywide, where Asian residents make up 12 to 17 percent of the population, compared to Bradbury's 38 percent.

[Table 3](#) shows the change in racial/ethnic composition in Bradbury using the 2006-2010 and 2015-2019 ACS. The racial/ethnic composition in Bradbury has remained relatively constant. The White and Asian populations have decreased slightly, while the Black/African American, Hispanic/Latino, and multi-racial populations have increased slightly.

Table 3: Change in Racial/Ethnic Composition – Bradbury (2010-2019)

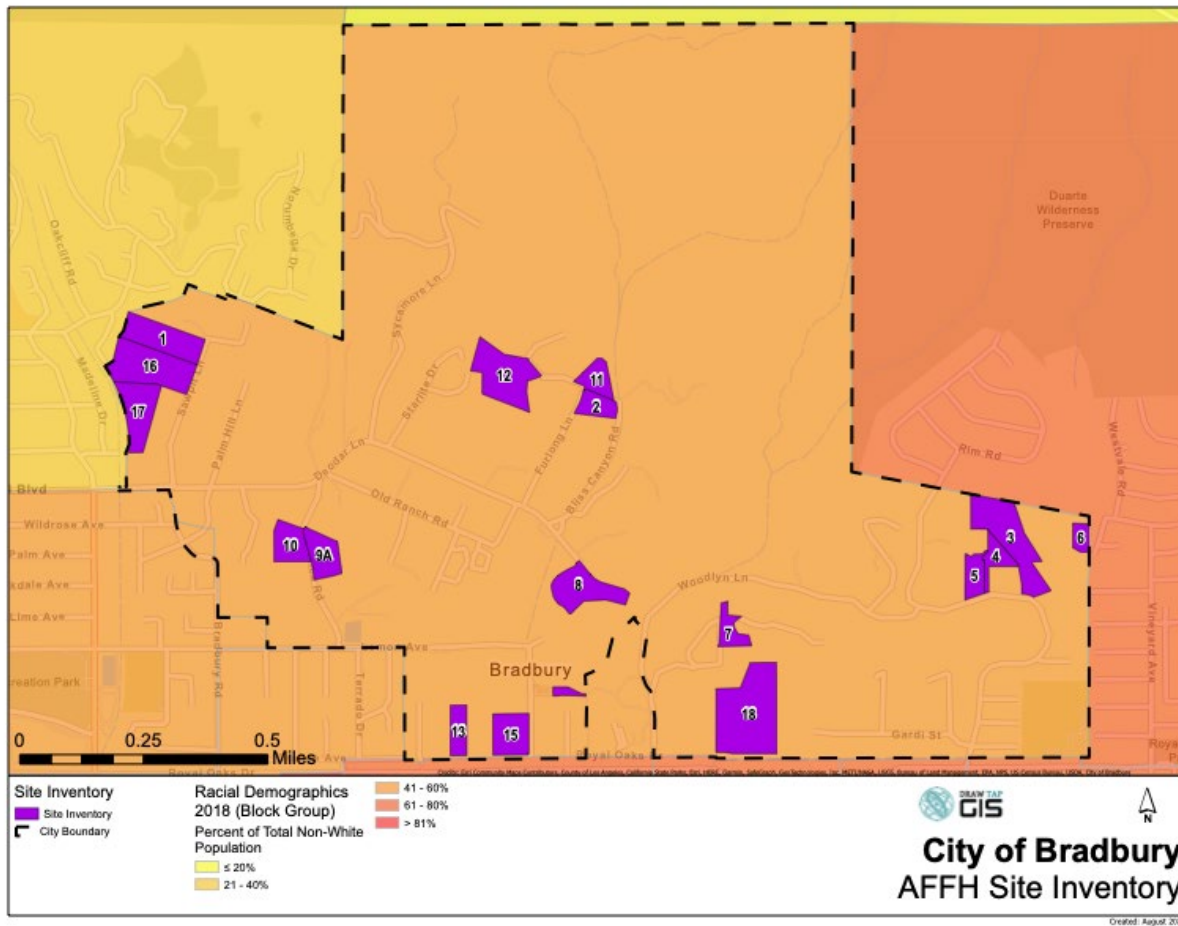
Race/Ethnicity	2010		2019	
	Persons	Percent	Persons	Percent
White	478	48.9%	376	45.1%
Black/African American	6	0.6%	8	1.0%
American Indian/Alaska Native	0	0.0%	0	0.0%
Asian	394	40.3%	312	37.5%
Native Hawaiian/Pac. Islander	0	0.0%	0	0.0%
Hispanic/Latino	100	10.2%	124	14.9%
Other	0	0.0%	13	1.6%
Total	978	100.0%	833	100.0%
Source: 2015-2019 and 2006-2010 ACS (5-Year Estimates).				

Dissimilarity indices are not available for Bradbury and since Bradbury is only made up of one census tract, areas of minority population concentrations cannot be determined.

Sites Inventory

Figure 5 shows the distribution of the RHNA units in the City's sites inventory by percentage minority race by tract. Since the City is only made up of one tract, all sites are located in a tract where the minority concentration is between 41 and 60 percent (or 55 percent as shown in [Table 3](#)).

Figure 5: RHNA Unit Distribution by % Minority Race by Tract



Disability

Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trend

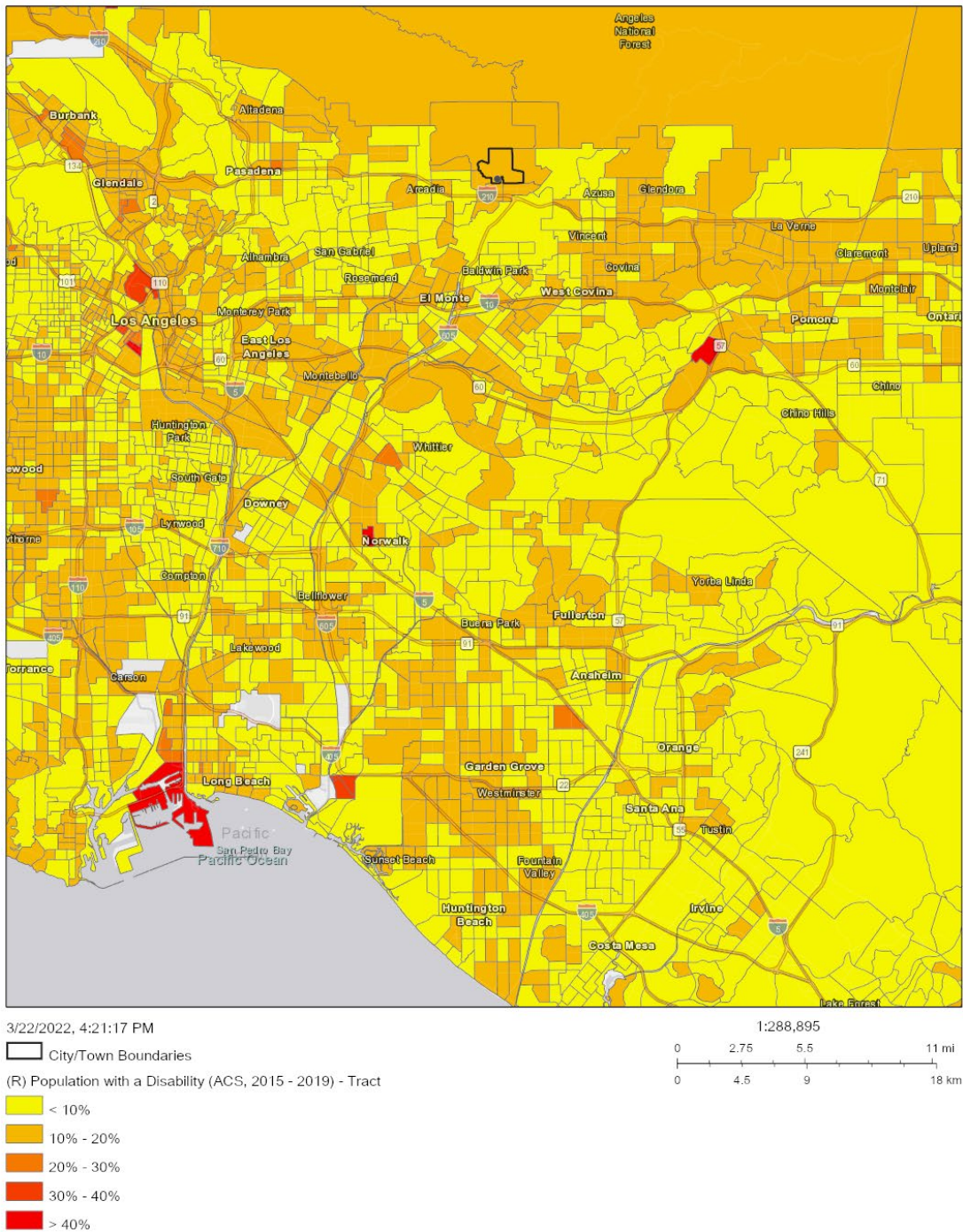
According to the 2015-2019 ACS ([Table 4](#)), 9.9 percent of Los Angeles County residents experience a disability. Bradbury has a smaller population of persons with disabilities (8.3 percent) compared to the County, and the neighboring cities of Azusa (8.4 percent), Duarte (12.9 percent), and Monrovia (9.2 percent). The most common type of disability in the County and all neighboring cities is ambulatory difficulties, followed by independent living difficulties and cognitive difficulties.

Table 4: Disability Population- Los Angeles County, Bradbury, and Neighboring Cities

	Los Angeles County	Bradbury	Azusa	Duarte	Monrovia
Total Persons with a Disability	992,719	69	4,172	2,746	3,361
% Pop with a Disability	9.9%	8.3%	8.4%	12.9%	9.2%
By Age					
Under 18 years	6.6%	0.0%	4.3%	4.4%	3.8%
18-64	53.2%	27.5%	56.9%	45.7%	42.3%
65 and over	46.4%	72.5%	42.7%	54.3%	55.9%
By Disability Type ¹					
With a hearing difficulty	25.5%	14.5%	25.4%	26.8%	29.9%
With a vision difficulty	19.8%	18.8%	18.0%	25.7%	18.8%
With a cognitive difficulty	38.6%	29.0%	39.2%	32.1%	27.5%
With an ambulatory difficulty	54.3%	84.1%	51.3%	55.9%	60.0%
With a self-care difficulty	27.4%	42.0%	21.6%	25.6%	26.6%
With an independent living difficulty	42.8%	34.8%	40.6%	39.5%	46.6%
Notes: 1. Percentages do not add up to 100 percent because persons may indicate more than one type of disability. Source: 2015-2019 and 2006-2010 ACS (5-Year Estimates).					

As shown in Figure 6 less than 20 percent of the population in most tracts in Los Angeles County are persons with disabilities. Tracts with disabled populations exceeding 20 percent are not concentrated in one area of the County. Tracts with larger shares of persons with disabilities closest to Bradbury are in Pasadena, Glendale, City of Los Angeles, and Whittier . The concentration of persons with disabilities in Bradbury is slightly higher than its neighboring census tracts. Baldwin Park, San Gabriel, and West Covina overall tend to have more census tracts with smaller disabled populations compared to Bradbury and Duarte.

Figure 6: Regional Concentration of Persons with Disabilities (2019)



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Local Trend

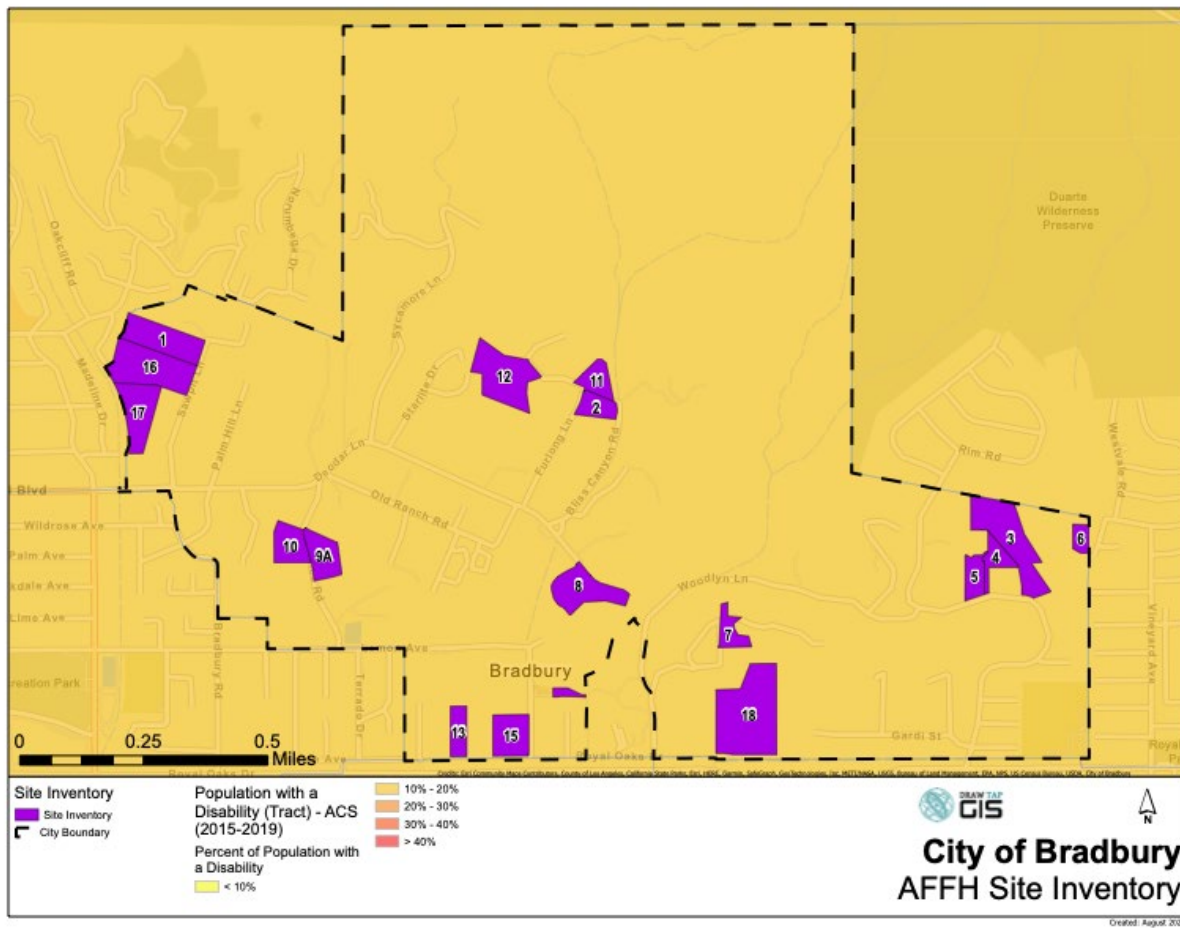
Since the 2009-2013 ACS, the disabled population in Bradbury increased slightly from 7.9 percent to 8.3 percent during the 2015-2019 ACS. The 69 residents, 50 of these were 65 years and older. Ambulatory difficulties and self-care difficulties are the most common disability type in Bradbury; 84 percent of persons with a disability residents experience an ambulatory difficulty and 42 percent experience self-care difficulty. Bradbury's population of persons with disabilities is less than the countywide share. However, while the population of persons with disabilities tend to be split between adults and seniors, over 72 percent of Bradbury's population with a disability is over 65 years old.

Since the City of Bradbury is made up of only one tract, there is no identifiable geographical concentration of persons with disabilities within the City.

Sites Inventory

Figure 7 shows the distribution of the sites in the City's sites inventory by percentage population with a disability by tract. Since the City is only made up of one tract, all sites are located in a tract where the percentage of the population with a disability is between 10 and 20 percent.

Figure 7: RHNA Units by % Population with a Disability



Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law.

Regional Trend

Approximately 30 percent of Bradbury households have one or more child under the age of 18 ([Table 5](#)). The City's share of households with children is lower than the County, and the neighboring cities of Azusa and Monrovia but higher than the city of Duarte ([Table 5](#)). For the County and the selected jurisdiction, single parent households make up less than 10 percent of all households. Azusa has the highest share of single-female headed households with children (7.8 percent) while Duarte and Monrovia have the lowest (4.8 percent). More than 65 percent of children in Bradbury and the surrounding cities live in married couple households ([Table 6](#)).

Table 5: Housing Type Composition – Households (HH) with Children

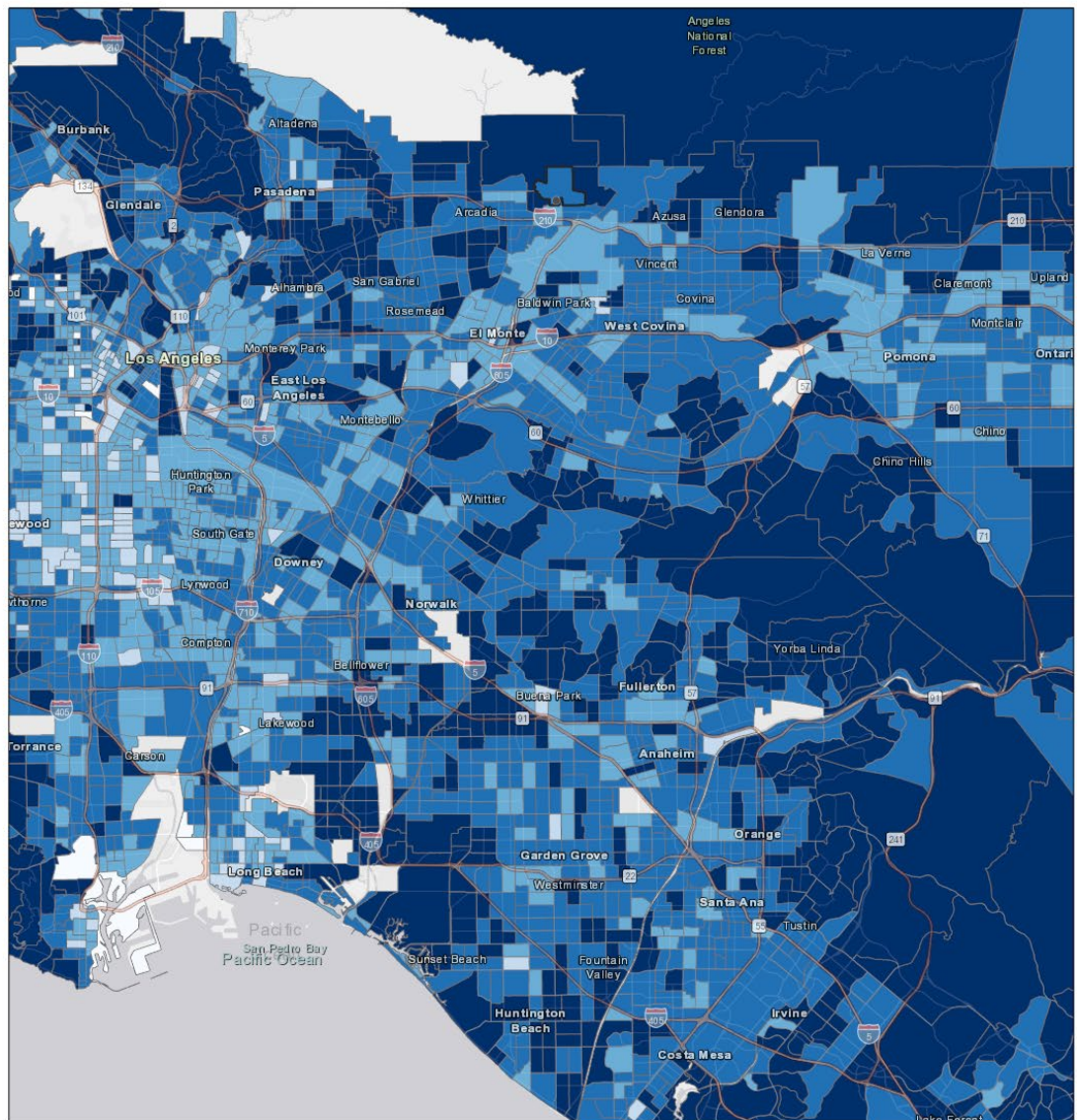
	Los Angeles County	Bradbury	Azusa	Duarte	Monrovia
HH with Children	33.0%	30.0%	37.6%	28.2%	30.7%
Married-couple HH w/children	28.3%	24.8%	32.1%	23.3%	26.5%
Cohabiting Couple HH w/children	19.3%	18.5%	22.1%	16.0%	19.2%
Single Male HH w/children	2.6%	0.0%	2.2%	2.5%	2.5%
Single Female HH w/children	6.4%	6.3%	7.8%	4.8%	4.8%
Source: 2015-2019 ACS (5-Year Estimates)					

Table 6: Housing Type Composition – Children Population

	Los Angeles County	Bradbury	Azusa	Duarte	Monrovia
Children Pop in:					
Married-couple HH	65.2%	77.9%	65.0%	68.5%	69.0%
Cohabiting Couple HH	9.6%	0.0%	10.1%	5.9%	4.5%
Single Male HH	5.0%	0.0%	1.9%	4.0%	6.8%
Single Female HH	20.2%	22.1%	23.0%	21.6%	19.7%
Source: 2015-2019 ACS (5-Year Estimates)					

[Figure 8](#) shows that census tracts with the lowest percentage of children in married-couple households are concentrated in the City of Los Angeles and its surrounding areas while in the San Gabriel Valley, over 40 percent of children per tract live in married-couple households. Inversely, [Figure 9](#) shows percent of children living in single-parent female-headed households by tract. Children in female-headed households are most concentrated in the area southwest of Bradbury, including the City of Los Angeles, and unincorporated Los Angeles County communities, and the areas around Long Beach and Lakewood. In general, there are more children living in female-headed households in the central Los Angeles County areas compared to the South Bay, Westside, Gateway, San Fernando Valley, and San Gabriel Valley cities.

Figure 8: Regional Percent of Children in Married Couple Households (2019)



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City/Town Boundaries

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

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

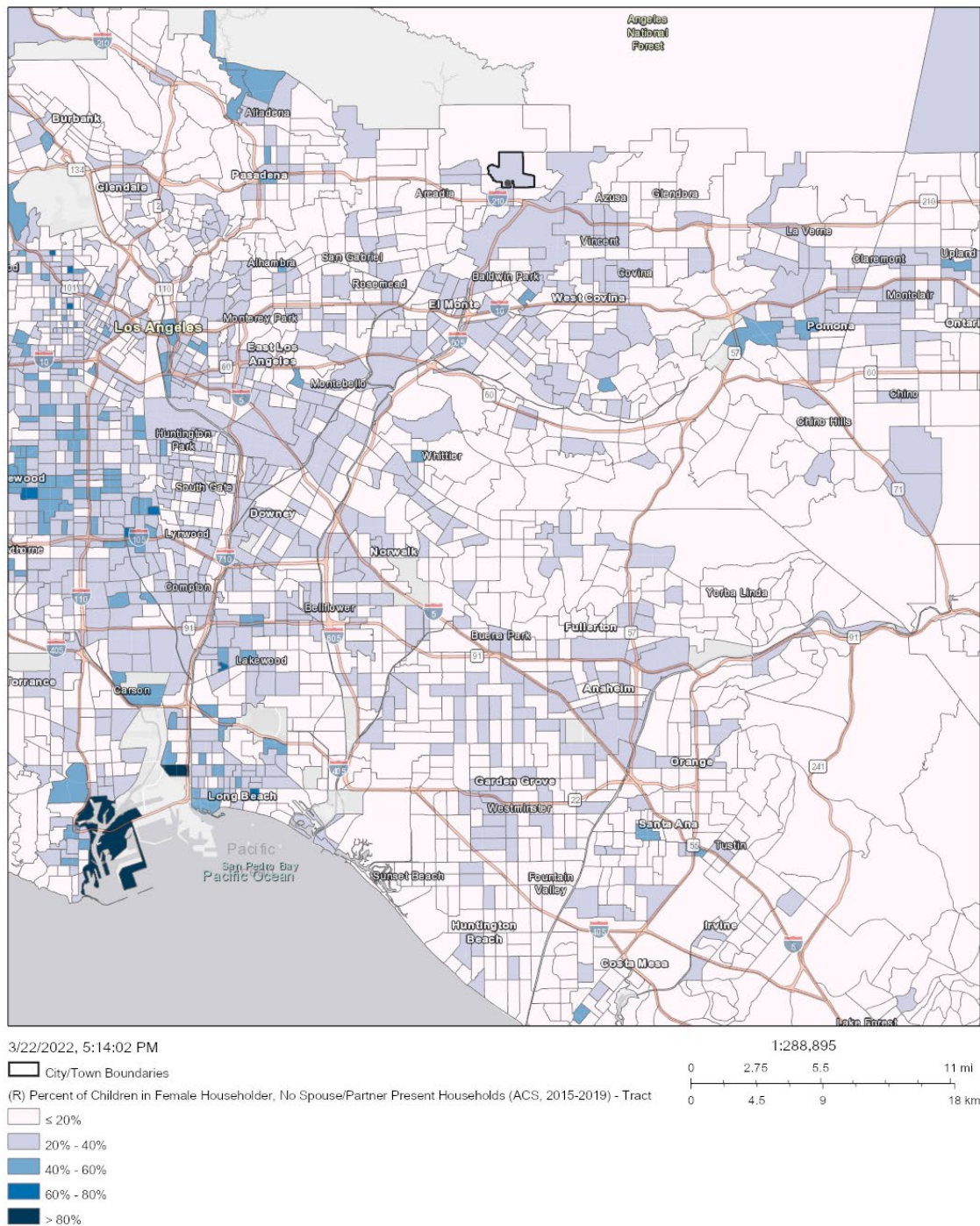
1:288,895
0 2.75 5.5 11 mi
0 4.5 9 18 km

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CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure 9: Regional Percent of Children in Female-Headed Households (2019)



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CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Local Trend

Bradbury has seen a significant decrease in households with children. During the 2006-2010 ACS, there were 107 households with children representing 37 percent of all City households. The most recent 2015-2019 ACS estimates there is now only 81 households with children in Bradbury representing 30 percent of total households. Approximately six percent of households in the City are single-parent households with all of them being female-headed single-parent households ([Table 5](#)). Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services.

As shown, Bradbury is only one census tract and between 60 and 80 percent of children in the census tract live in married-couple households. Census tracts surrounding Bradbury have anywhere between 40 percent and over 80 percent of children in married couple households. [Figure 9](#) shows that the percent of children in female-headed households is between 20 and 40 percent. There is a concentration of tracts with a larger population of children in single female-headed southeast of Bradbury in Baldwin Park and Covina. Since there is only one census tract in the City of Bradbury, geographical concentrations of children within the City could not be identified.

Sites Inventory

Figure 10 shows the distribution of the sites in the City's sites inventory by percentage of children in married-couple households by tract. Figure 11 shows distribution of the sites in the City's sites inventory by percentage of children in single female-headed households by tract. Since the City is only made up of one tract, all units are located in a tract with a high concentration of children in married-couple households (78 percent) and a low concentration of children in single female-headed households (22 percent).

Figure 10: RHNA Units by % Children in Married-Couple Households

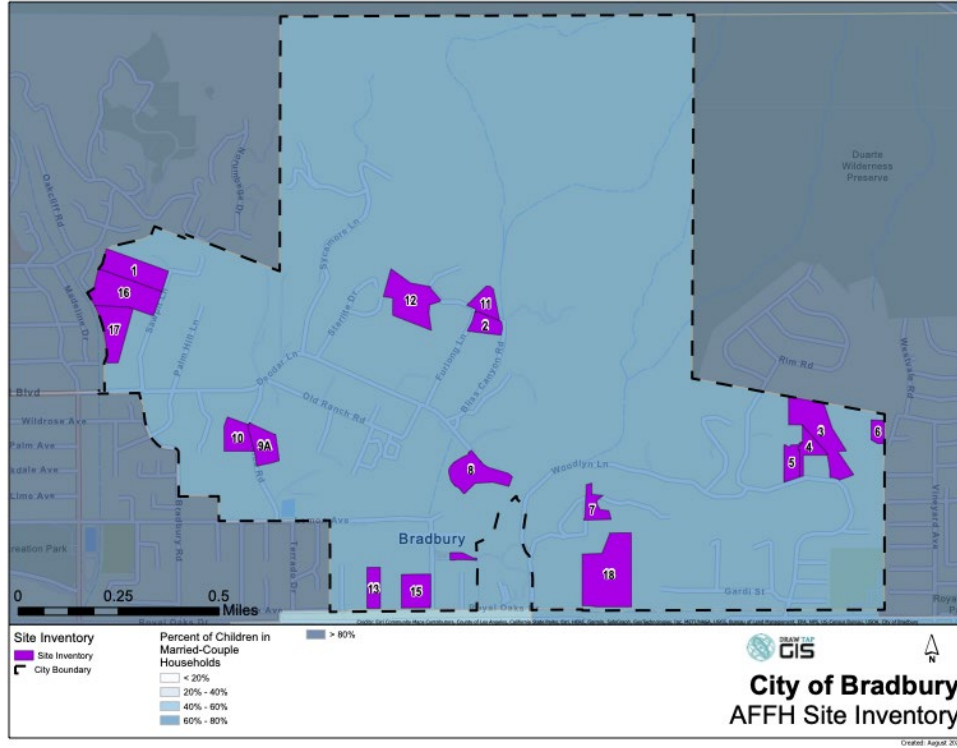
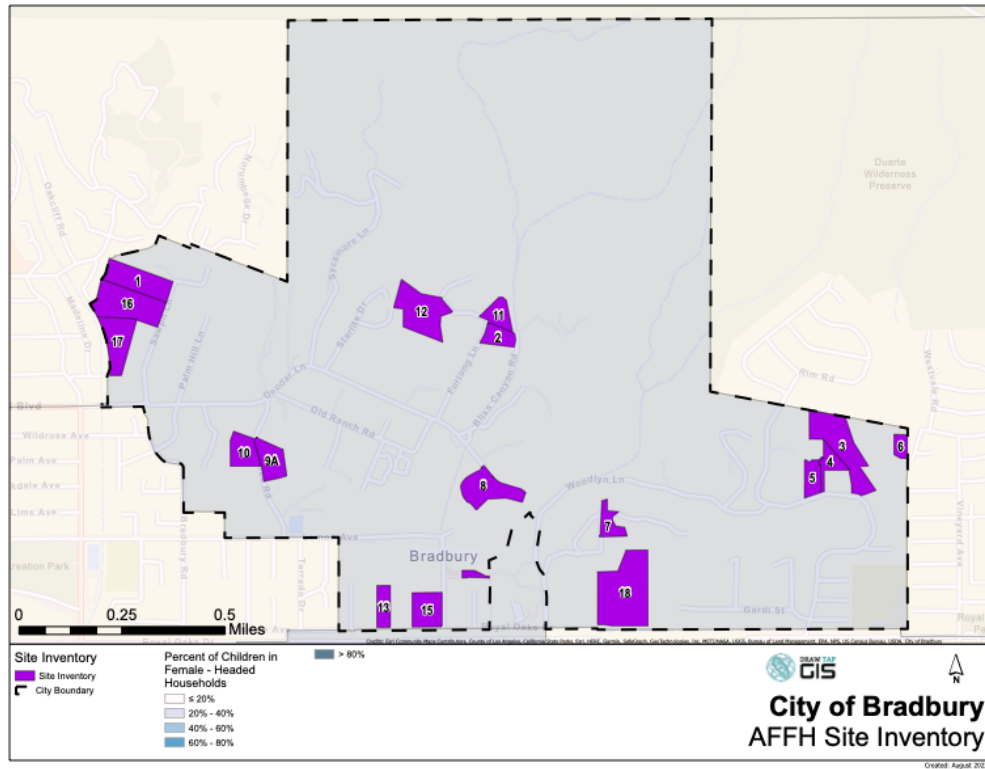


Figure 11: RHNA Units by % of Children in Single Female-Headed Households



Income

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD's income definition of up to 80 percent of the AMI).

Regional Trend

According to Comprehensive Housing Affordability Strategy (CHAS)⁵ data based on the 2014-2018 ACS presented in [Table 7](#), shows that 23 percent of Bradbury residents earn 80 percent or less than the area median family income and are considered lower income, compared to 49 percent Countywide. According to the 2015-2019 ACS, the median household income in Los Angeles County is \$68,044 and was similar to median incomes in the Bradbury's neighboring cities ([Table 8](#)). However, Bradbury's median income in 2019 is more than double that of Los Angeles County.

Table 7: Income Level Distribution

Income Category	Bradbury		Los Angeles County	
	Households	Percent	Households	Percent
<30% AMI	25	8.6%	600,340	18.2%
31-50% AMI	8	2.8%	460,445	13.9%

⁵ Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households.

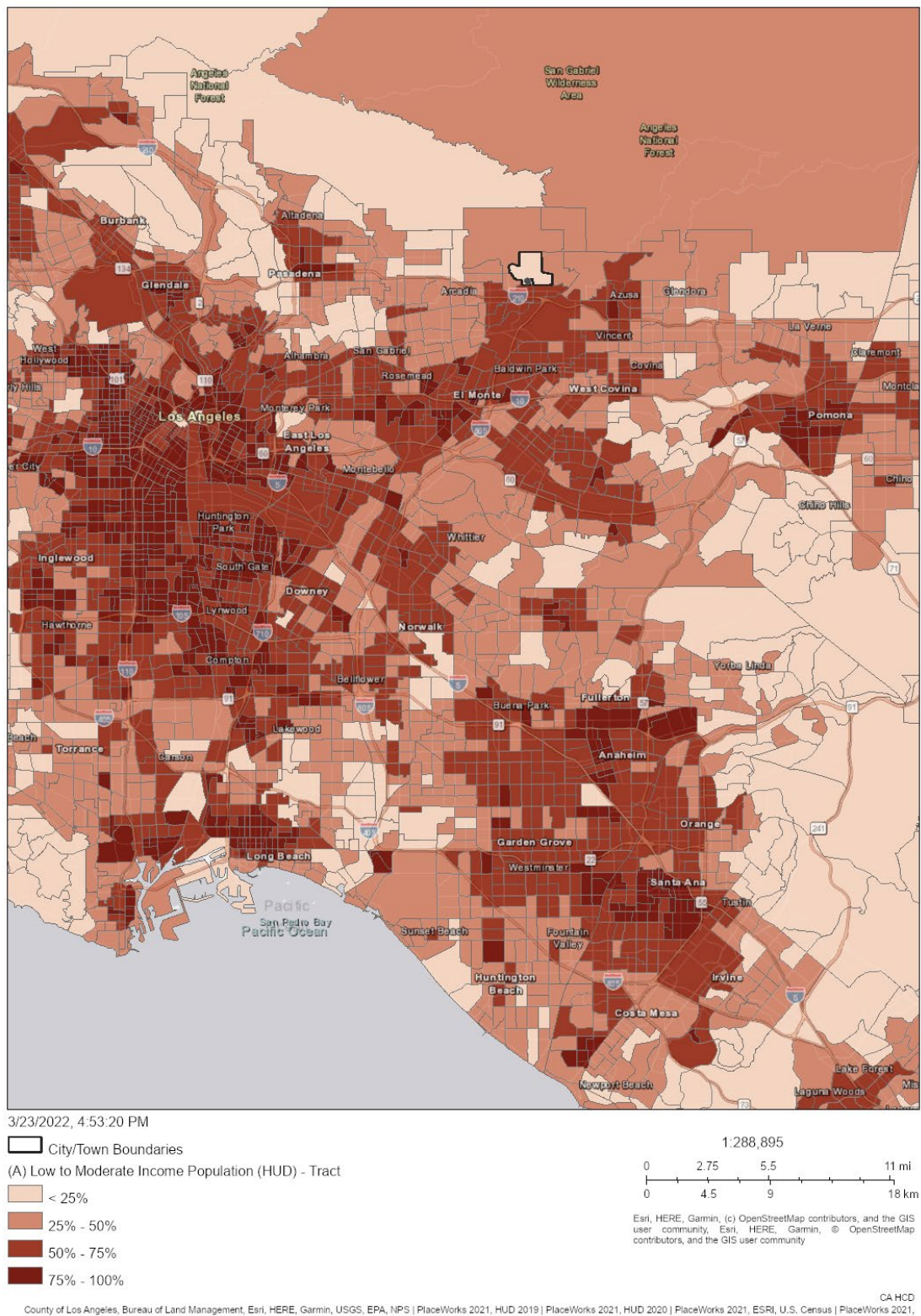
51-80% AMI	35	12.1%	570,615	17.3%
81-100% AMI	0	0.0%	316,295	9.6%
>100% AMI	220	75.9%	1,358,415	41.1%
Total	290	100.0%	3,306,110	100.0%
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data (based on 2014-2018 ACS), 2020.				

Table 8: Median Income

Jurisdiction	Median Income
Bradbury	\$146,250
Azusa	\$68,216
Duarte	\$75,083
Monrovia	\$77,111
Los Angeles County	\$68,044
Source: 2015-2019 ACS (5-Year Estimates)	

[Figure 12](#) shows LMI areas regionally. LMI households are most concentrated in the central Los Angeles County region around the City of Los Angeles. There are smaller concentrations of LMI households in and around the San Gabriel Valley in El Monte, Baldwin Park, Duarte and Azusa.

Figure 12: Regional Concentration of LMI Households by Tract



Source: HCD AFFH Data Viewer, HUD LMI data (2011-2015 ACS), 2021.

Local Trend

Bradbury's median household income in 2019 was twice that of Los Angeles County and its surrounding cities ([Table 8](#)). Bradbury also has the lowest concentration of LMI households among its neighbors and most of the San Gabriel Valley ([Figure 12](#)). All of the census tracts surrounding Bradbury have higher concentrations of LMI population than the City's census tract.

As pointed out above, Bradbury's share of LMI population is lower than that of Los Angeles County and its neighboring cities— about a quarter of Bradbury households earn LMI incomes, compared to close to 50 percent in the County. However, some races experience higher rates of LMI and extremely low incomes than others in the City (Table 9). While the share of White and Asian LMI households is similar to that in the City (25 percent), about 75 percent of Hispanic households in the City are considered LMI. The disproportion is also evident in extremely low income households. While only 10 percent of all Bradbury households earn extremely low incomes, 25 percent of the City's Hispanic households earn extremely low incomes.

Table 9: Extremely Low and LMI Households by Race/Ethnicity

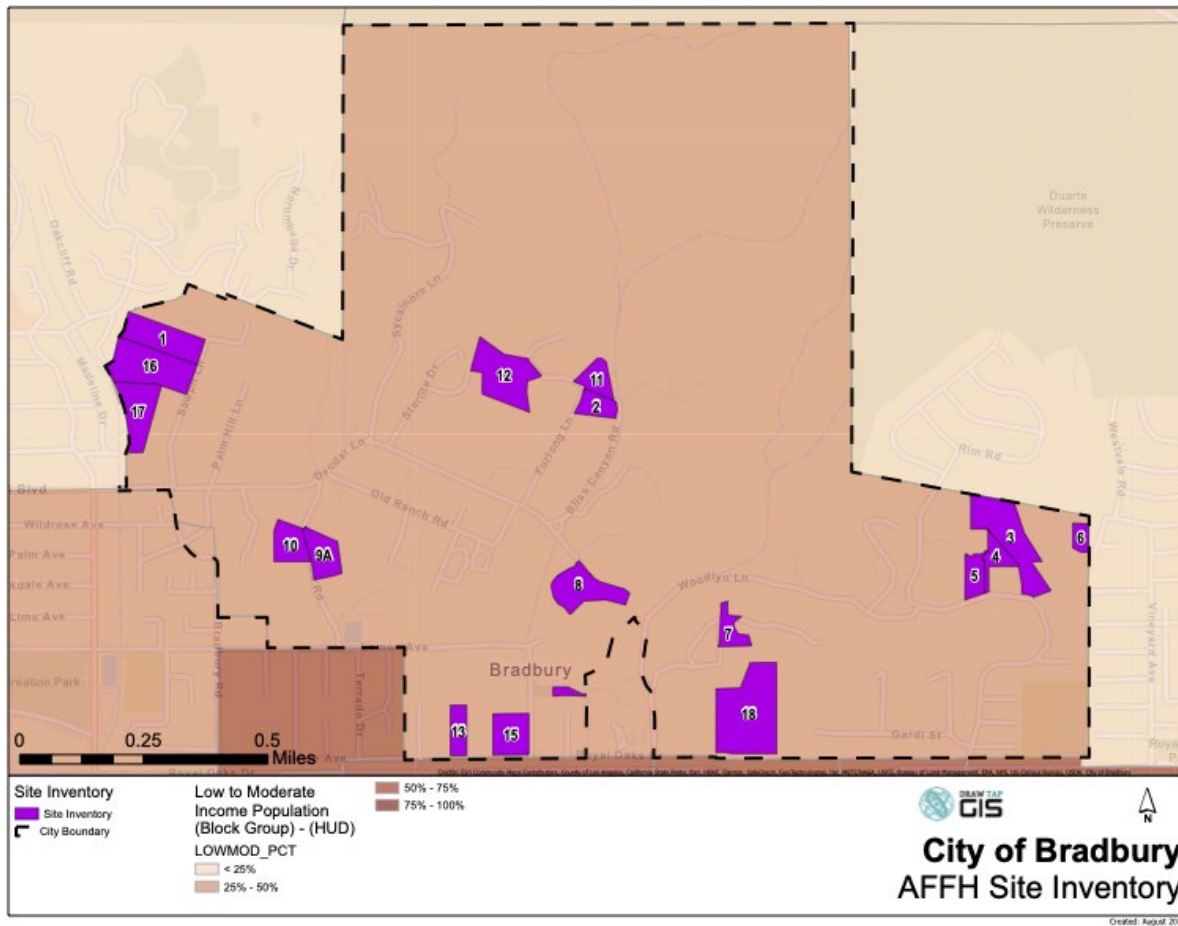
Race/Ethnicity	Total HH	HH Below 30% AMI	Share Below 30% AMFI	HH Below 80% AMI (LMI)	Share Below 80% AMI (LMI)
White	163	12	7.4%	34	20.9%
Black	4	0	0.0%	0	0.0%
Asian	115	14	12.2%	30	26.1%
Am Ind	0	0	--	0	--
Paci Is	0	0	--	0	--
Hispanic	16	4	25.0%	12	75.0%
All	291	29	10.0%	71	24.4%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data (based on 2014-2018 ACS), 2020.

Sites Inventory

Figure 13 shows the distribution of RHNA units by percentage of low and moderate income population by tract. Bradbury is a single-tract city with a low concentration of low and moderate income population- about 25 percent of Bradbury's population are LMI. All RHNA units are therefore located in a tract with a low concentration of LMI population.

Figure 13: RHNA Distribution by % Low and Moderate Income Population



Summary of Fair Housing Issues: Integration and Segregation

Non-Hispanic Whites make up the largest racial/ethnic group in Bradbury (45 percent) followed by Asians (38 percent). Bradbury differs from its neighbors in that only 15 percent of its population is Hispanic, compared to the Hispanic share Countywide (48 percent).

Bradbury also has one of the smallest shares of persons with disabilities compared to the County and neighboring cities. However, compared to them, Bradbury's population with a disability is mostly made up of seniors. Persons with disabilities are not concentrated in one area of the City (because it is only made up of one tract).

About 77 percent of children live in married couple households in Bradbury, a higher share compared to Los Angeles County and neighboring cities. Bradbury also has the smallest share of single-parent households with children compared to the County and neighboring cities. Only 6.3 percent of households are single-parent households with children (and they are all single female-headed).

Less than 24 percent of Bradbury's population are considered LMI- about half the rate of LMI population in the County (49 percent). Geographically, Bradbury's census tract is the one of the few that have less than 25 percent LMI population (the closest are in Sierra Madre, South Pasadena, and Walnut). There are no HCV users, public housing buildings, or subsidized housing units in the City.

Overall, the City is made up of an affluent mostly White and Asian aging community (over 50 percent are over the age of 45). Seniors also make up the largest share of the City's population with a disability- with the most common disability being ambulatory difficulties. This indicates a higher need for housing for seniors with disabilities.

3. *Racially and Ethnically Concentrated Areas of Poverty*

Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD identified census tracts with a majority non-White population with a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. HCD and the California Tax Credit Allocation Committee (TCAC) convened as the Fair Housing Task Force to create opportunity maps. The maps include identifying areas of high segregation and poverty. TCAC Opportunity Maps are discussed in more detail in Section 4 of this fair housing analysis.

Regional Trend

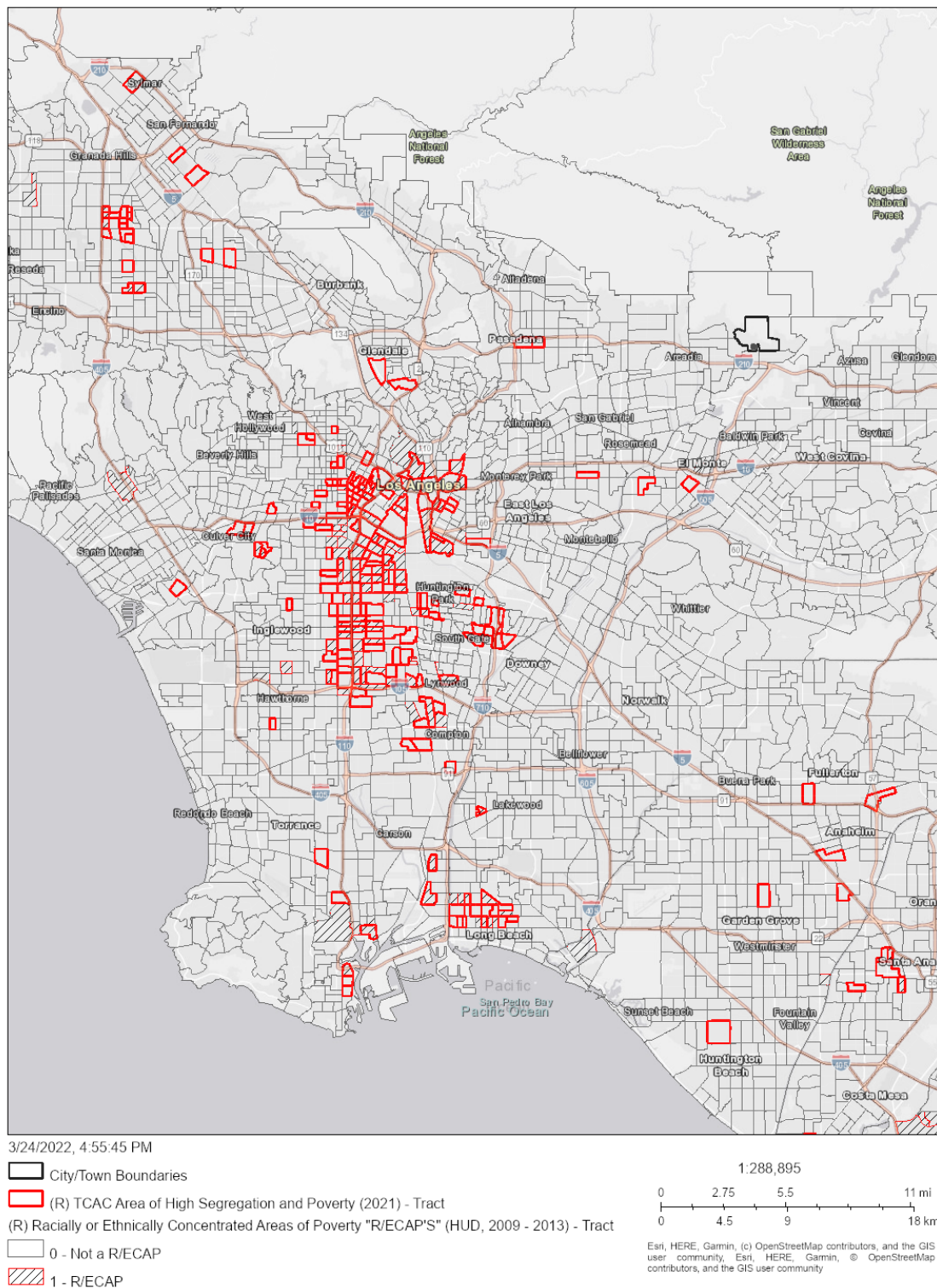
Approximately 15 percent of the County population is below the federal poverty level ([Table 10](#)). Black/African American, American Indian/Alaska Native, persons of a race not listed ("other"), and Hispanic/Latino populations all experience poverty at a higher rate than the average countywide. The proportion of non-Hispanic White residents under the poverty level is the lowest (9.6 percent) compared to other racial/ethnic groups in the County. About 25 percent of persons with disabilities are also below the poverty level. Poverty rates are similar or slightly lower than Countywide for Bradbury's neighboring cities. Like in the County, minority races, especially Hispanics tend to have higher poverty rates compared to citywide rates.

Figure 14 shows R/ECAPs and TCAC designated areas of high segregation and in the Los Angeles County region. R/ECAPs and areas of high segregation and poverty are concentrated in the central County areas around the City of Los Angeles. Areas of high segregation and poverty have also been identified in tracts in El Monte, Rosemead, and Pasadena in the San Gabriel Valley.

Table 10: Poverty Status by Race/Ethnicity and Disability

Population Below Federal Poverty Level	Los Angeles County	Bradbury	Azusa	Duarte	Monrovia
Population for whose poverty status is determined	14.9%	5.5%	14.2%	10.2%	7.8%
Population with a disability	25.0%	0.0%	18.4%	13.8%	18.1%
By Race:					
White alone	9.6%	0.5%	11.1%	6.9%	8.1%
Black or African American alone	20.8%	0.0%	8.5%	9.6%	7.9%
American Indian and Alaska Native alone	18.1%	-	5.8%	0.0%	0.0%
Asian alone	11.1%	11.1%	10.3%	9.5%	9.5%
Native Hawaiian and Other Pacific Islander alone	11.5%	-	0.0%	0.0%	18.0%
Other ¹	30.9%	60.0%	28.2%	14.0%	16.3%
Hispanic or Latino origin (of any race)	18.1%	7.3%	16.0%	12.3%	6.9%
Notes:					
1. Includes “Some Other Race” and “Two or More Races”					
Source: 2015-2019 American Community Survey (Five-Year Estimates)					

Figure 14: Regional R/ECAPs and TCAC Areas of High Segregation and Poverty (2021)



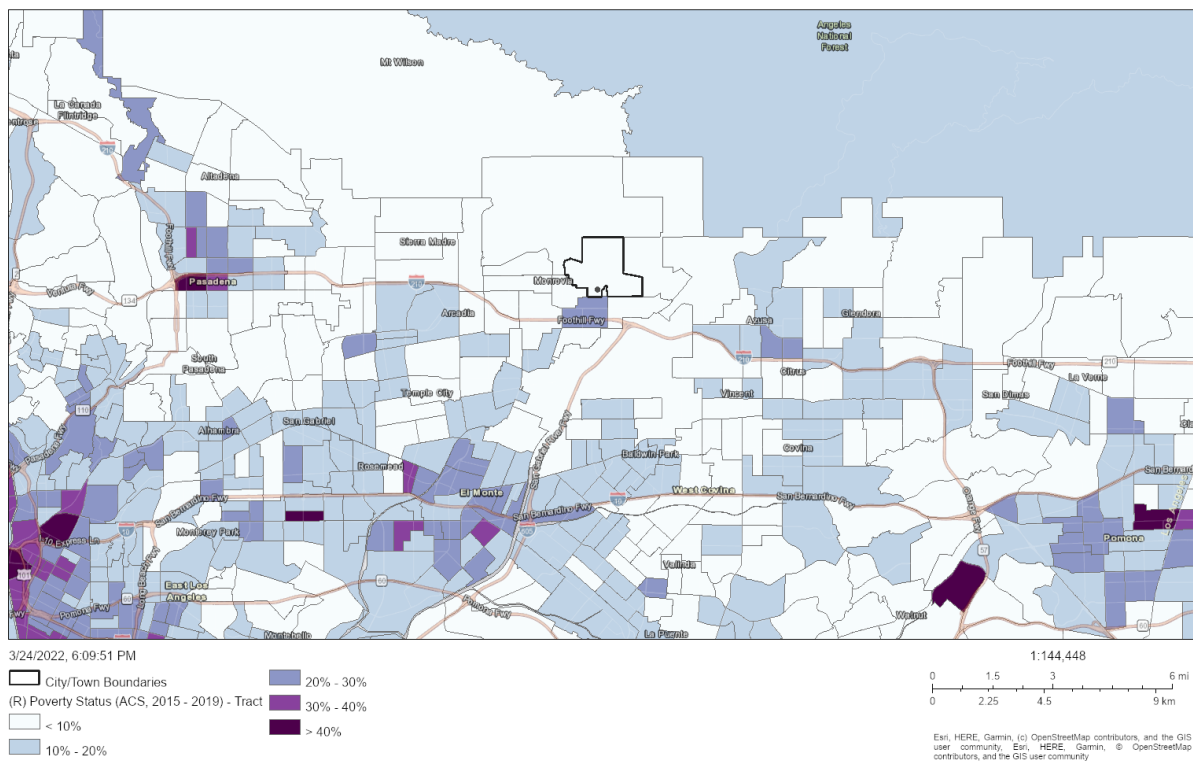
Source: HCD AFFH Data Viewer, HUD R/ECAP data (2009-2013 ACS) and TCAC Opportunity Maps (2021).

Local Trend

As shown in [Table 10](#) above, 5.5 percent of the Bradbury population is below the poverty level, a fewer than the County as a whole and fewer than the selected neighboring cities. Persons of “some other race” or “two or more races,” Asian, and Hispanic/Latino populations all experience poverty at a higher rate than the average citywide. Notably, zero percent of persons with disabilities are below the poverty level.

According to HCD’s 2021 Data Viewer, there are no R/ECAPs or TCAC designated areas of high segregation and poverty in Bradbury ([Figure 15](#)). Poverty status in Bradbury and its neighboring jurisdiction by tract is presented in [Figure 15](#). Consistent with the estimates in [Table 10](#), less than 10 percent of the population in the Bradbury census tract is under the poverty level. There is one tract adjacent to the Bradbury’s southern city limit (in Duarte) where 20 percent to 30 percent of the population is under the poverty level.

Figure 15: Poverty Status (2019)



County of Los Angeles, Bureau of Land Management; Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, CA HCD

Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Racially and Ethnically Concentrated Areas of Affluence (RCAAs)

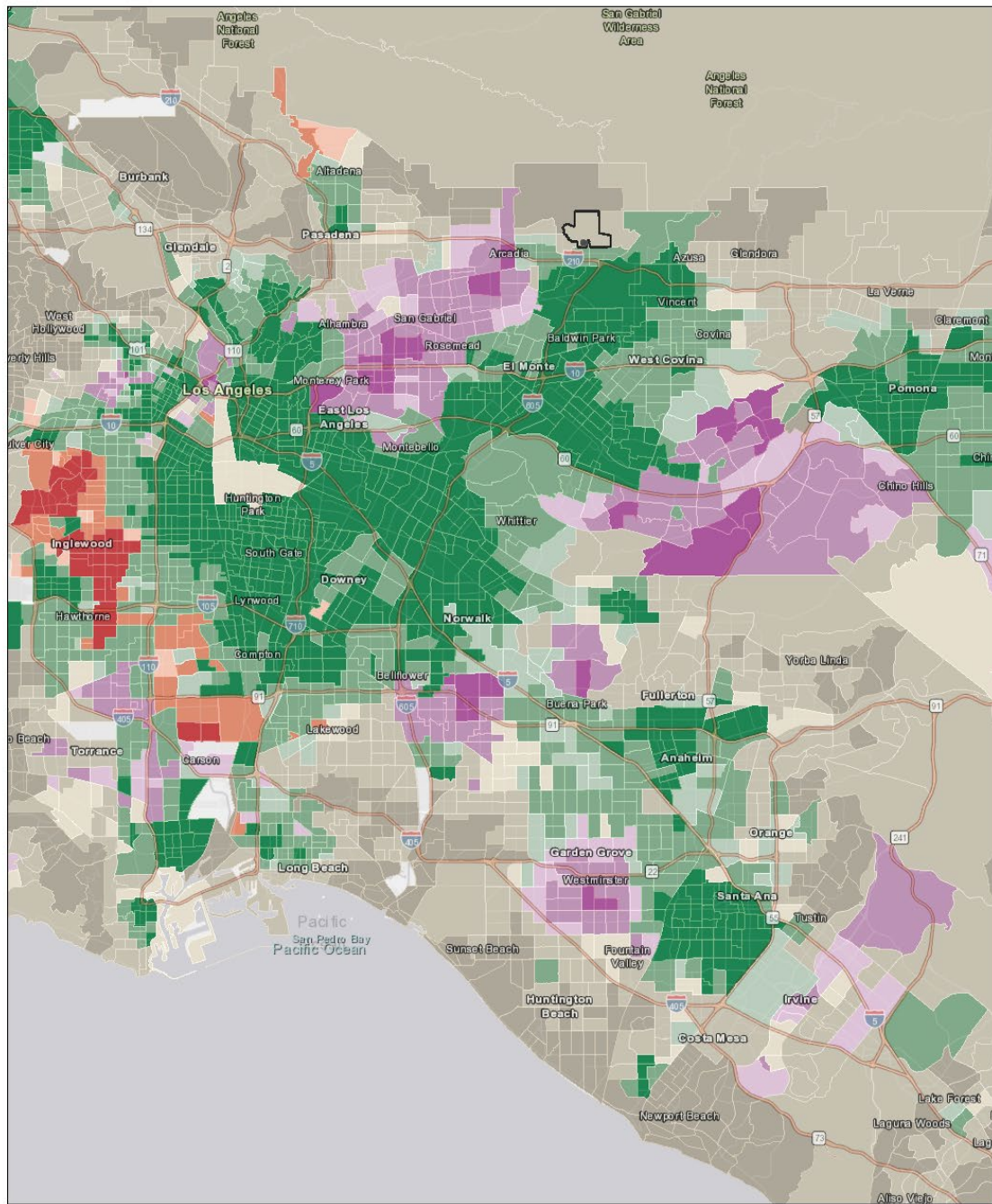
While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD Policy Paper defines racially concentrated areas of affluence as affluent, White communities.⁶ According to this report, Whites are the most racially segregated group in the United States and “in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.” Based on their research, HCD defines RCAAs as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016).

Regional Trend

Figure 16 shows the predominant racial/ethnic group by tract and **Figure 17** shows median income by block group in the Los Angeles County and San Gabriel Valley region. White predominant populations are generally located outside the central Los Angeles County area. Parts of the San Fernando Valley, communities along the Los Angeles National Forests in the San Gabriel Valley (Pasadena, Arcadia, Bradbury, Glendora, and La Verne) are predominantly White. The central Los Angeles, San Gabriel Valley, and Gateway cities have Hispanic, African American, or Asian majority populations. The central Los Angeles areas are composed of mostly block groups with median incomes below the 2020 State median of \$87,100. Block groups with median incomes exceeding \$125,000 are more concentrated in similar areas as predominantly White tracts—Burbank, Pasadena, Arcadia, Glendora, and La Verne.

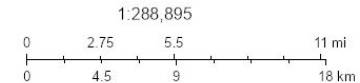
⁶ Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation. Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in *Cityscape: A Journal of Policy Development and Research* (21,1, 99-124).

Figure 16: Regional Predominant Racial/Ethnic Population



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- City/Town Boundaries
- (R) Predominant Population - White Majority Tracts
 - Slim (gap < 10%)
 - Sizeable (gap 10% – 50%)
 - Predominant (gap > 50%)
- (R) Predominant Population - Hispanic Majority Tracts
 - Slim (gap < 10%)
 - Sizeable (gap 10% – 50%)
 - Predominant (gap > 50%)
- (R) Predominant Population - Asian Majority Tracts
 - Slim (gap < 10%)
 - Sizeable (gap 10% – 50%)
 - Predominant (gap > 50%)
- (R) Predominant Population - African American Majority Tracts
 - Slim (gap < 10%)
 - Sizeable (gap 10% – 50%)
 - Predominant (gap > 50%)

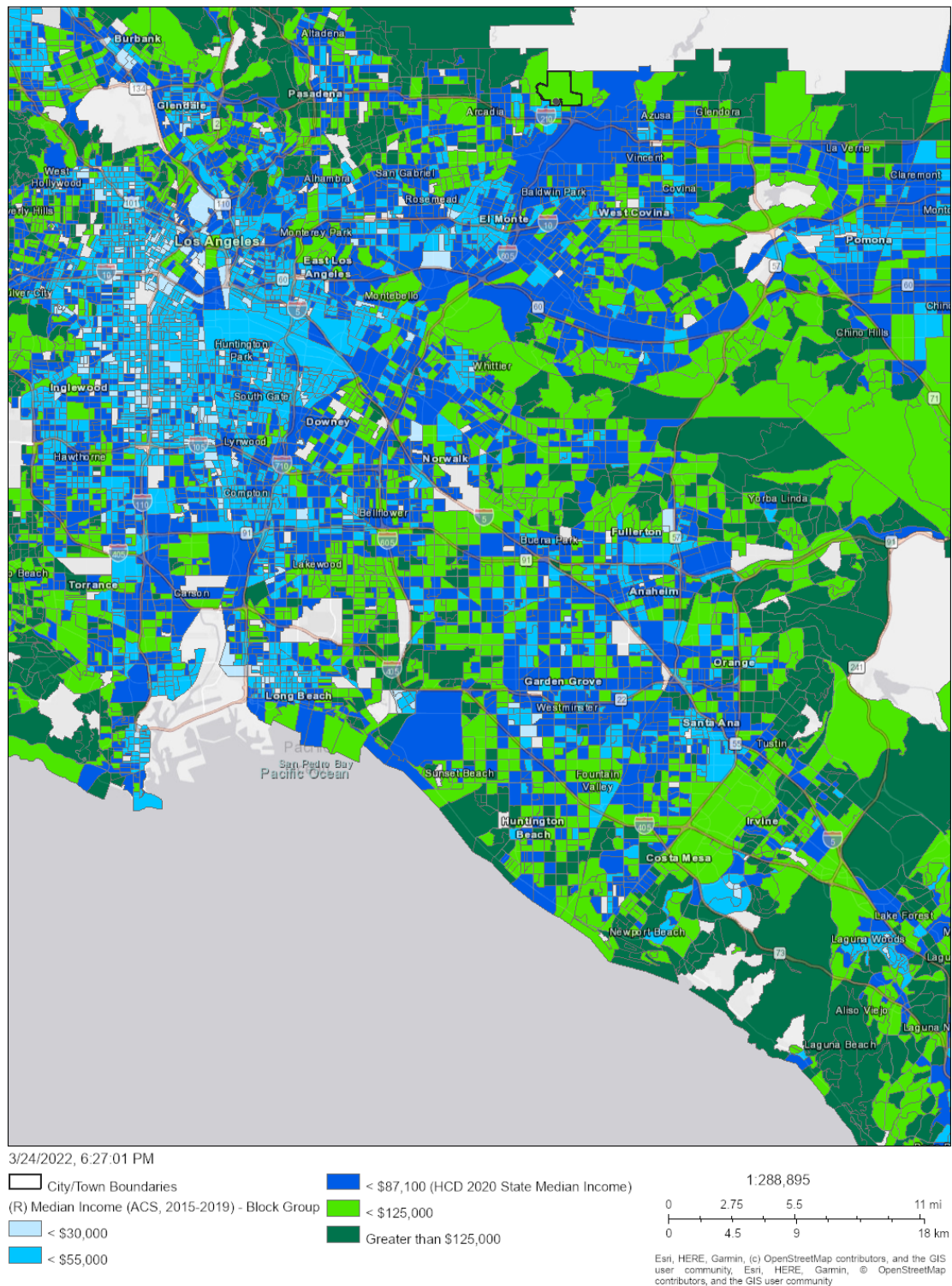


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Source: HCD AFFH Data Viewer, 2021.

Figure 17: Regional Median Income by Block Group



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 202

Local Trend

As shown in [Figure 18](#), the Bradbury census tract does not have a racial/ethnic minority population smaller than 20 percent (or inversely a White population greater than 80 percent). The minority population in Bradbury is 55 percent. Median incomes as shown in [Figure 18](#) is less than \$125,000 (although the 2015-2019 ACS estimate in Table 8 was \$146,250). Since Bradbury does not meet either criteria, it is not considered a RCAA.

However, an important trend to note is the high median incomes of both White and Asian households in Bradbury compared to the County. As can be seen in Table 11, White and Asian residents are the predominant races in the City, with each making up about 40 percent of Bradbury's population. White and Asian households in Bradbury earn significantly higher median incomes than in all Bradbury households and Los Angeles County. Particularly, median income for Asian households doubled between 2019 and 2020 estimates from \$97,917 to \$200,208, while their population share only increased by less than one percent.

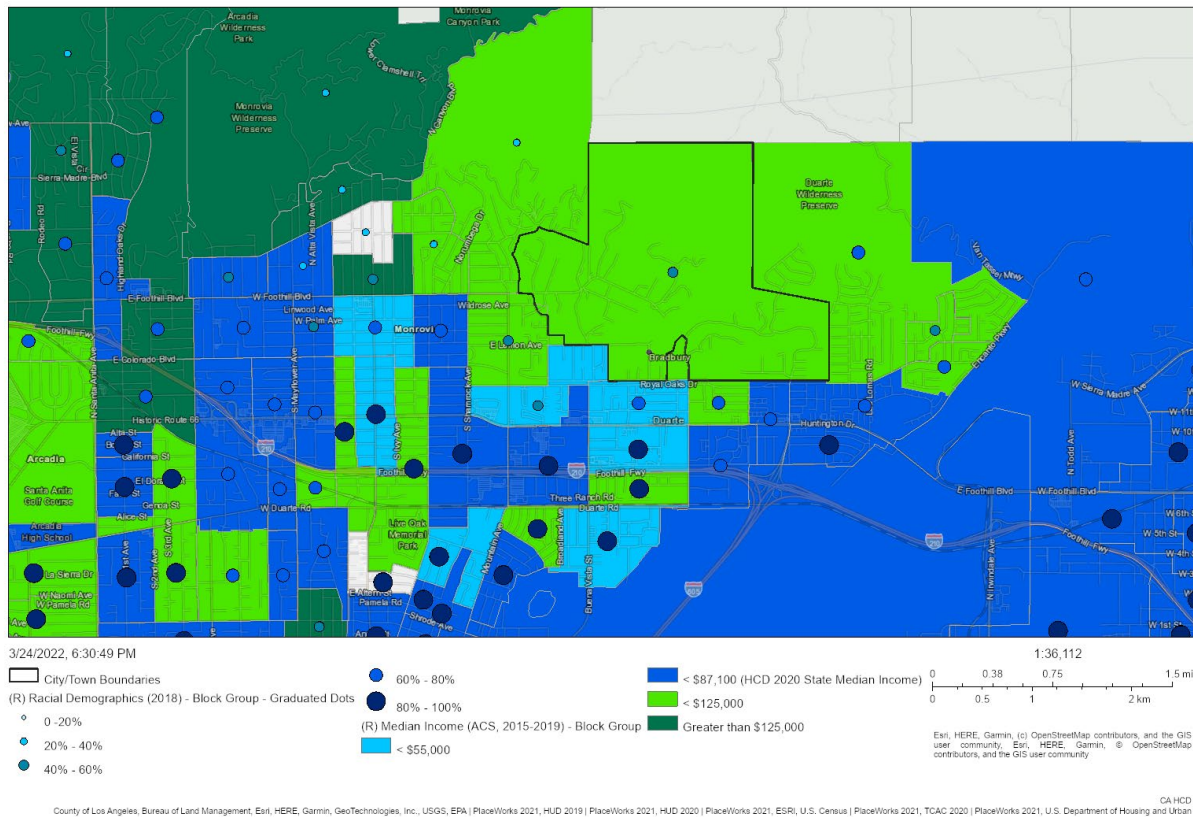
Table 11: White and Asian Median Household Income and Population

	Bradbury		Los Angeles County	
	2019	2020	2019	2020
White Alone	\$160,729	\$203,438	\$79,304	\$79,027
Asian Alone	\$97,917	\$200,208	\$86,544	\$83,252
All Households	\$146,250	\$181,875	\$72,797	\$71,358
% White	45.1%	36.4%	26.2%	25.6%
% Asian	37.5%	38.8%	14.4%	14.7%
Note: Median income estimates were not available for Black/African Americans, Native Americans, Pacific Islander, or Hispanic households in Bradbury. Source: 2015-2019 ACS and 2016-2020 ACS (5-Year Estimates)				

Summary of Fair Housing Issues- Concentration of Poverty and Minorities

Only 5.5 percent of the Bradbury's population is below the poverty level. There are no R/ECAPs or TCAC designated areas of high segregation and poverty in the City. There are no RCAAs in the City. Bradbury does not have a White population greater than 80 percent its total population though it does have one of the highest median incomes in the area (and more than double that in the County). However, the Asian household income more than doubled from 2019 to 2020, with both White and Asian households continuing to have higher median incomes than the City overall in 2020.

Figure 18: Racial/Ethnic Minority Populations and Median Income



Source: HCD AFFH Data Viewer, 2021

4. Access to Opportunity

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. This section presents the HUD-developed index scores based on nationally available data sources to assess Bradbury residents' access to key opportunity assets by race/ethnicity and poverty level compared to Los Angeles County. Index values range from 0 to 100 for the following opportunity indicator indices:

- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the index value, the higher the school system quality is in a neighborhood.*
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. *The higher the index value, the higher the labor force participation and human capital in a neighborhood.*
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area

(CBSA). *The higher the transit trips index value, the more likely residents in that neighborhood utilize public transit.*

- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index value, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher the index value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.*

To further assist in the analysis of access to opportunities, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators related to economic, environmental and educational opportunities and poverty and racial segregation. Based on these domain scores, tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. [Table 12](#) shows the full list of indicators.

Table 12: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

Poverty and Racial Segregation	Poverty: tracts with at least 30% of population under federal poverty line Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County
Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.	

Regional Trend

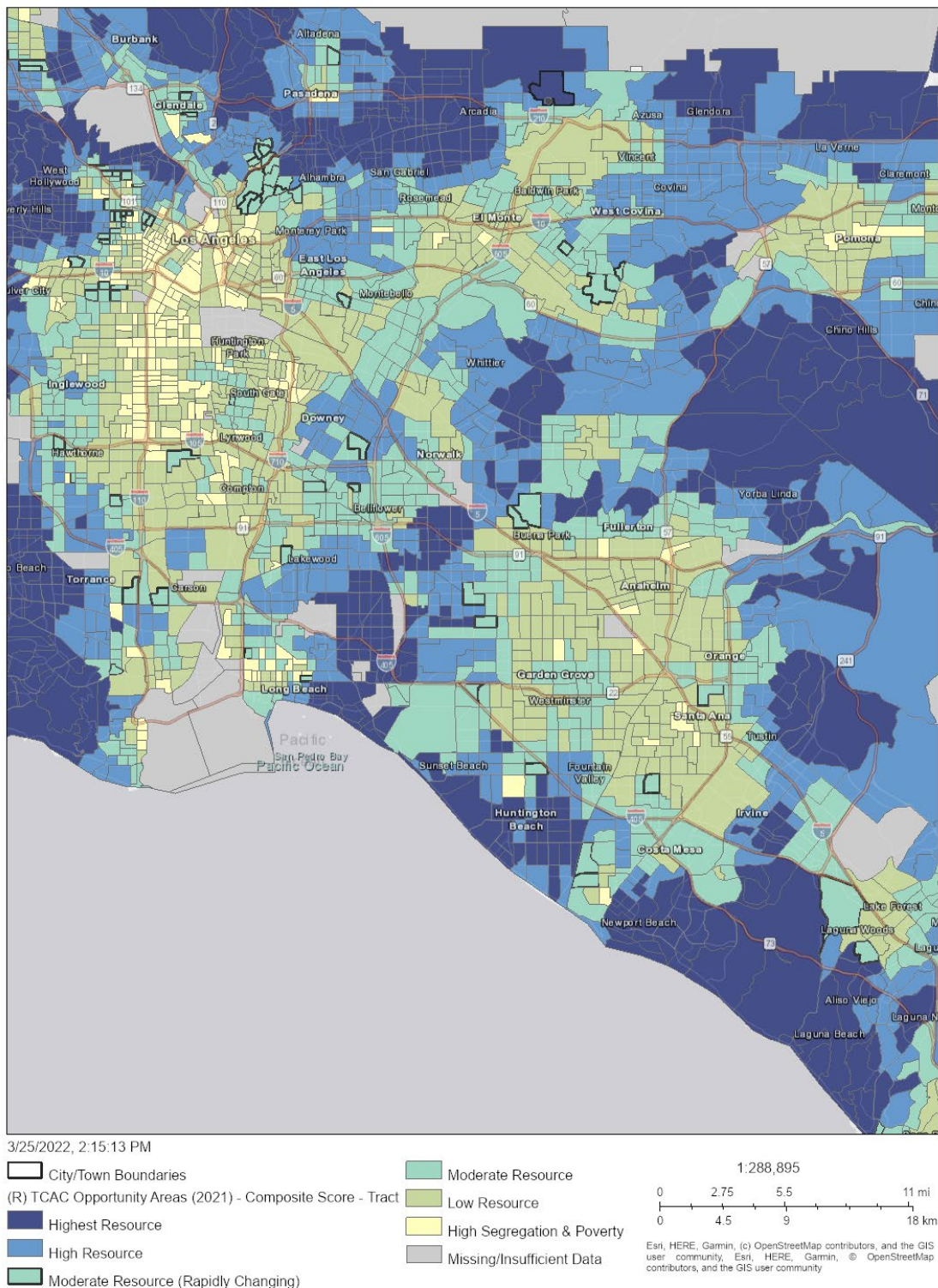
HUD Opportunity Indicator values for Los Angeles County are shown in [Table 13](#). The White population, including the population below the federal poverty line, received the highest values in low poverty, school proficiency, labor market participation, jobs proximity, and environmental health. Hispanic communities had the lowest values for the low poverty index and labor market participation index and Black communities had the lowest values for the school proficiency index, jobs proximity index, and environmental health index. Black residents were most likely to use public transit and have the lowest transportation costs (i.e. they had the highest transit index values and low transportation cost index values).

Table 13: Los Angeles County HUD Opportunity Indicators by Race/Ethnicity

	Low Poverty	School Prof.	Labor Market	Transit	Low Transp. Cost	Jobs Proximit y	Env. Health
Total Population							
White, non-Hispanic	62.59	65.09	65.41	82.63	74.09	55.80	18.99
Black, non-Hispanic	34.95	32.37	34.00	87.70	79.18	40.13	11.66
Hispanic	33.91	38.38	33.18	87.19	77.74	41.53	11.91
Asian or Pacific Islander, non-Hispanic	53.57	59.34	55.94	86.52	76.45	51.82	12.16
Native American, non-Hispanic	45.04	46.90	44.50	83.17	75.65	44.24	16.74
Population below federal poverty line							
White, non-Hispanic	50.68	58.06	57.49	86.42	79.48	57.52	16.66
Black, non-Hispanic	23.45	27.16	25.52	88.65	81.18	36.59	11.62
Hispanic	23.66	32.87	27.66	89.45	81.02	42.84	10.30
Asian or Pacific Islander, non-Hispanic	42.97	54.52	50.06	89.62	81.49	54.19	9.84
Native Amer., non-Hispanic	29.85	35.12	32.02	85.23	78.70	46.35	16.01
Source: HUD AFFH Database – Opportunity Indicators, 2020							

The central Los Angeles County areas around the City of Los Angeles are comprised of mostly low and moderate resource tracts and areas of high segregation and poverty. The El Monte/Baldwin Park area and San Fernando area, including Van Nuys/North Hollywood, also have concentrations of low resource areas and some areas of high segregation and poverty. High and highest resource areas are most concentrated in areas in and around Beverly Hills, La Cañada Flintridge, and Pasadena/Arcadia to the west of Bradbury and Glendale, Covina, La Verne and Claremont east of Bradbury. Most of North and Central Orange County are also considered areas of high opportunity.

Figure 19: Regional TCAC Opportunity Areas- Composite Scores



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021

Local Trend

HUD Opportunity Indicators data is limited for the City of Bradbury and is not available by race. [Table 14](#) shows the opportunity indices for the total population for tract 4302.00 (the City). Compared to the County, Bradbury residents have a higher labor force participation and human capital (higher labor market index) and a higher environmental quality compared to residents of any race in the County. Bradbury's poverty index value higher than most minority races but lower than that of Whites and Asian residents in the County. Also, Bradbury scored lower in transit trip index and low transportation cost index compared to the any race in County, meaning residents are less likely to use public transit and they have higher transportation costs.

Table 14: Bradbury HUD Opportunity Indicators

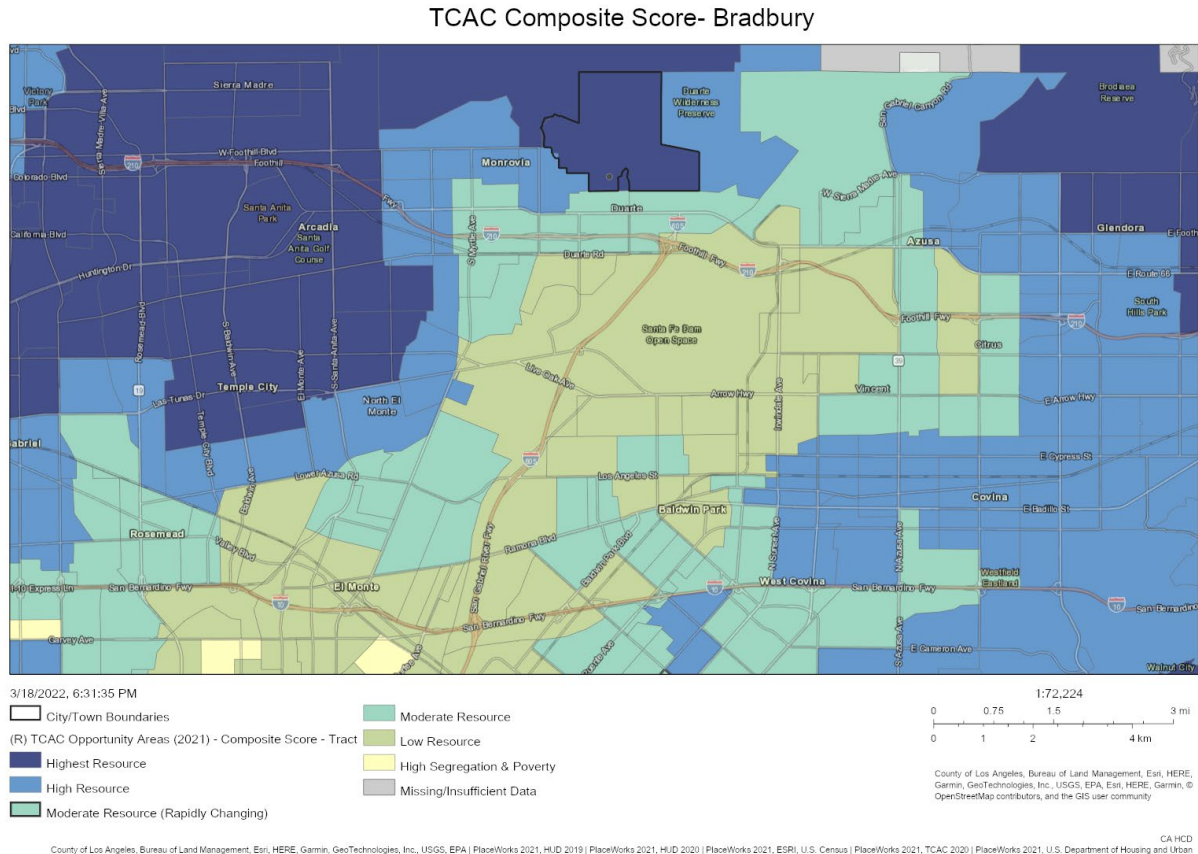
	Low Poverty	School Prof.	Labor Market	Transit	Low Transp. Cost	Jobs Proximity	Env. Health
Total Population	59	--	82	77	61	59	23
--= Not available							
Source: HUD AFFH Database – Opportunity Indicators, 2020.							

Opportunity map scores for the Bradbury census tract 4320.00 is presented in [Table 15](#). The City is considered an area with highest resources. Bradbury is surrounded by tracts with moderate to highest resources to the west, north, and east ([Figure 20](#)). Only census tracts directly south of Bradbury have low resources starting in Irwindale and Baldwin Park

Table 15: TCAC Opportunity Map Domain Scores for Bradbury

<u>Census Tract</u>	<u>Economic Domain Score</u>	<u>Environmental Domain Score</u>	<u>Education Domain Score</u>	<u>Composite Index Score</u>	<u>Final Category</u>
<u>06037430200</u>	<u>0.89</u>	<u>0.88</u>	<u>0.60</u>	<u>0.44</u>	<u>Highest Resource</u>
Source: California Fair Housing Task Force, 2021 TCAC/HCD Opportunity Maps, December 2020.					

Figure 20: Bradbury and Local TCAC Opportunity Areas- Composite Scores

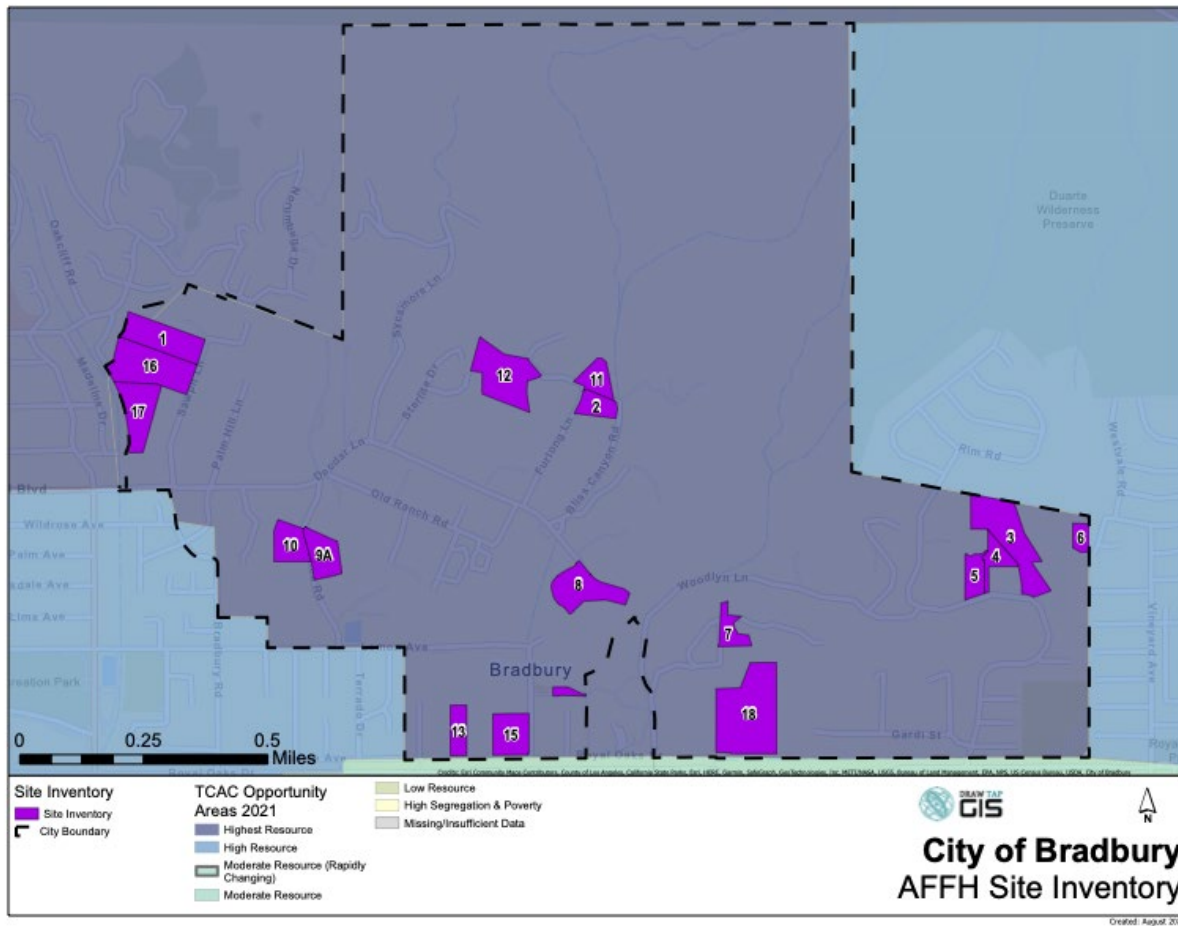


Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021

Sites Inventory

Figure 21 shows the distribution of RHNA units by TCAC composite scores. All RHNA units of all income levels are located in areas identified as “highest resource” because the City is made up of only one tract.

Figure 21: RHNA Units by TCAC Opportunity Map Category



Economic Opportunity

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. See [Table 12](#) for the complete list of TCAC Opportunity Map domains and indicators.

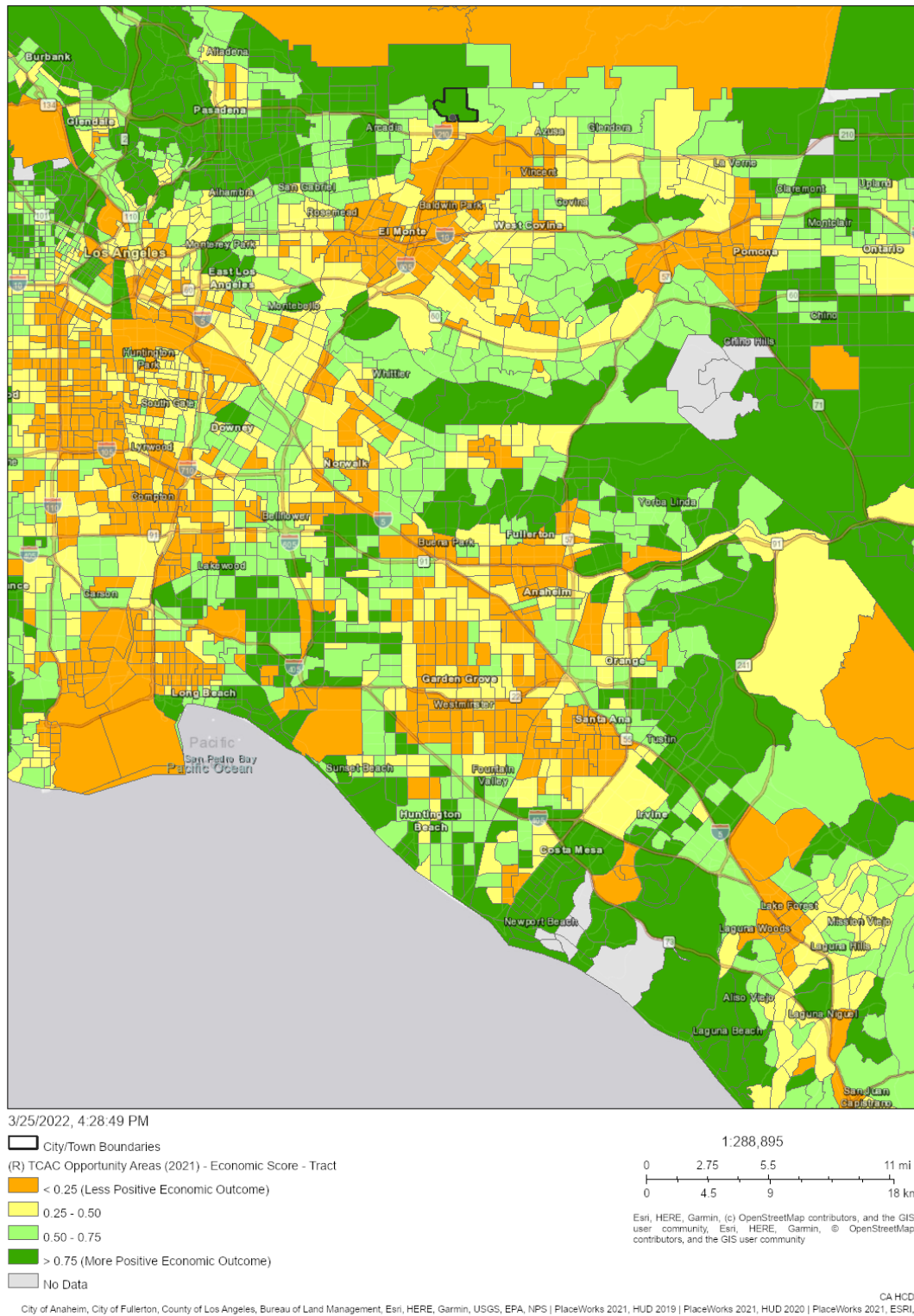
Regional Trend

[Figure 22](#) shows TCAC Opportunity Map economic scores in the Los Angeles region by tract. Consistent with final TCAC categories, tracts with the highest economic scores are concentrated in areas around Beverly Hills, Burbank, Pasadena, and Arcadia as well as north and central Orange County. Tracts with economic scores in the lowest quartile are concentrated in the central Los Angeles County areas, San Gabriel Valley cities around El Monte, and around the cities of Long Beach and Carson.

An important factor in the TCAC economic score is jobs proximity⁷. [Figure 23](#) shows that job hotspots (census tracts with the highest proximity to jobs) are located in the City of Los Angeles and its neighboring communities, northern San Fernando Valley (Burbank and Glendale) and most of Orange County. In the San Gabriel Valley, only a few census tracts in Pasadena and Claremont are considered to have the highest jobs proximity.

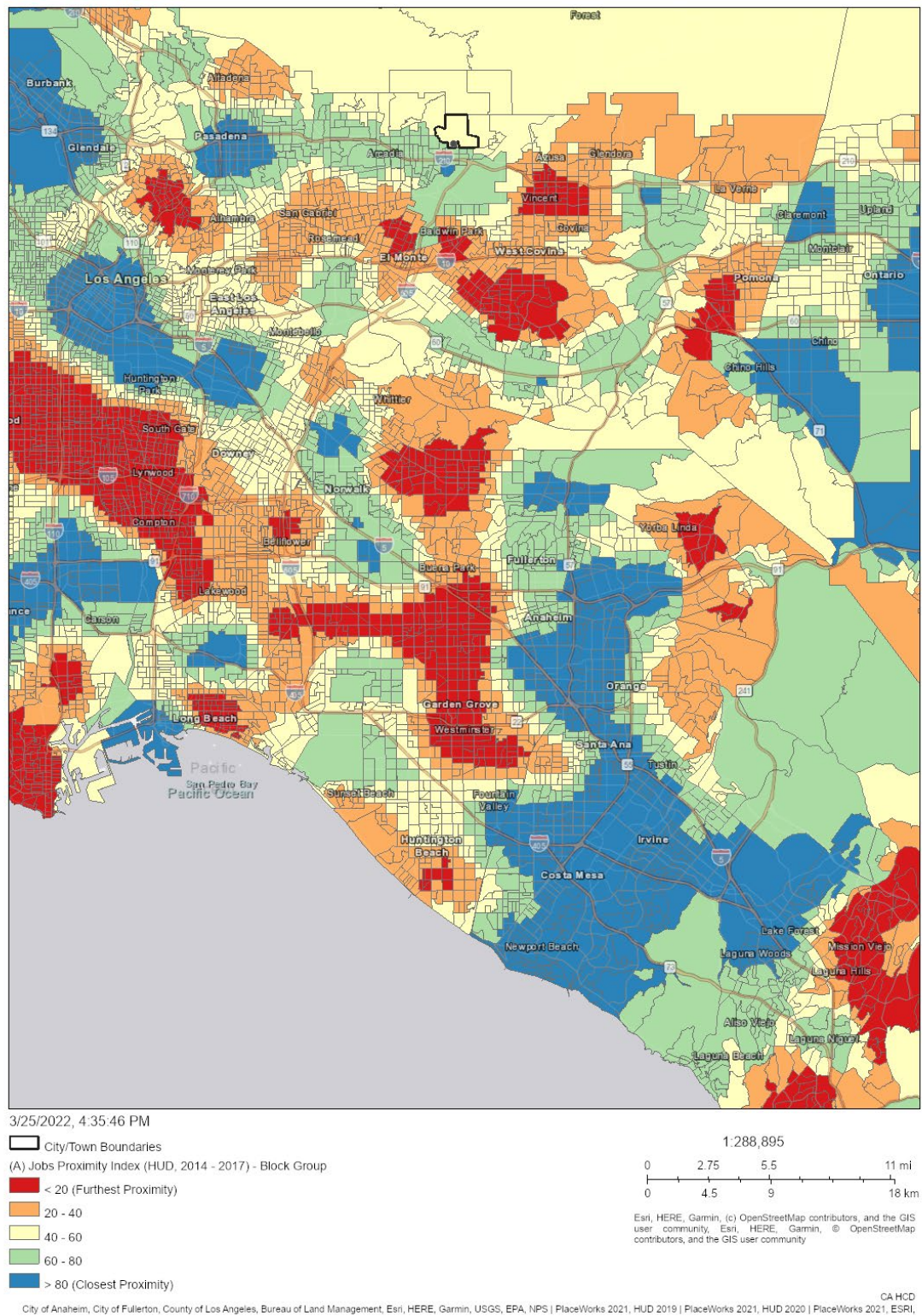
⁷ The TCAC Economic Scores are a composite of jobs proximity index values as well as poverty, adult education, employment, and median home value characteristics.

Figure 22: Regional TCAC Opportunity Areas – Economic Scores



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Figure 23: Regional Jobs Proximity Index



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021

Local Trend

According to the 2021 Opportunity Map presented in [Figure 22](#), Bradbury's TCAC economic score is within the highest quartile (over 0.75, the actual score is 0.89). Like the composite score, Bradbury is surrounded by tracts with more positive economic outcomes (scores greater than 0.5) to the north, west, and east. Economic scores are lowest south of Bradbury.

Bradbury is also not considered to be close to jobs. The jobs proximity index quantifies the accessibility of a given tract as a function of its distance to all job locations within a region, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. Bradbury's jobs proximity index is 59 and falls in the midrange of index scores pictured in [Figure 23](#). [Table 16](#) compares commuting characteristics of Los Angeles County residents to Bradbury residents. While mean travel time to work for Bradbury was not available, it is likely that it is higher than the County given that a higher share of Bradbury residents travel more than 60 minutes to go to work. About one third of Bradbury residents spend more than 60 minutes commuting to work. A higher share of Bradbury residents also travel outside of their City for work than the County- only 14 percent of Bradbury residents work in Bradbury- compared to 38 percent of Los Angeles County residents.

Table 16: Commuting Characteristics

	Los Angeles County	Bradbury
Mean Travel Time	31.8	N/A
Travel time to Work:		
<30 min	48.6%	49.1%
30-60 mins	36.6%	26.1%
60 or more minutes	14.8%	28.7%
Work in place of residence	38.4%	13.4%
Worked from home	5.6%	12.9%
Source: 2015-2019 ACS (5-year Estimates)		

HUD's Job Proximity Index can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation. This analysis is expanded on the Transportation section below.

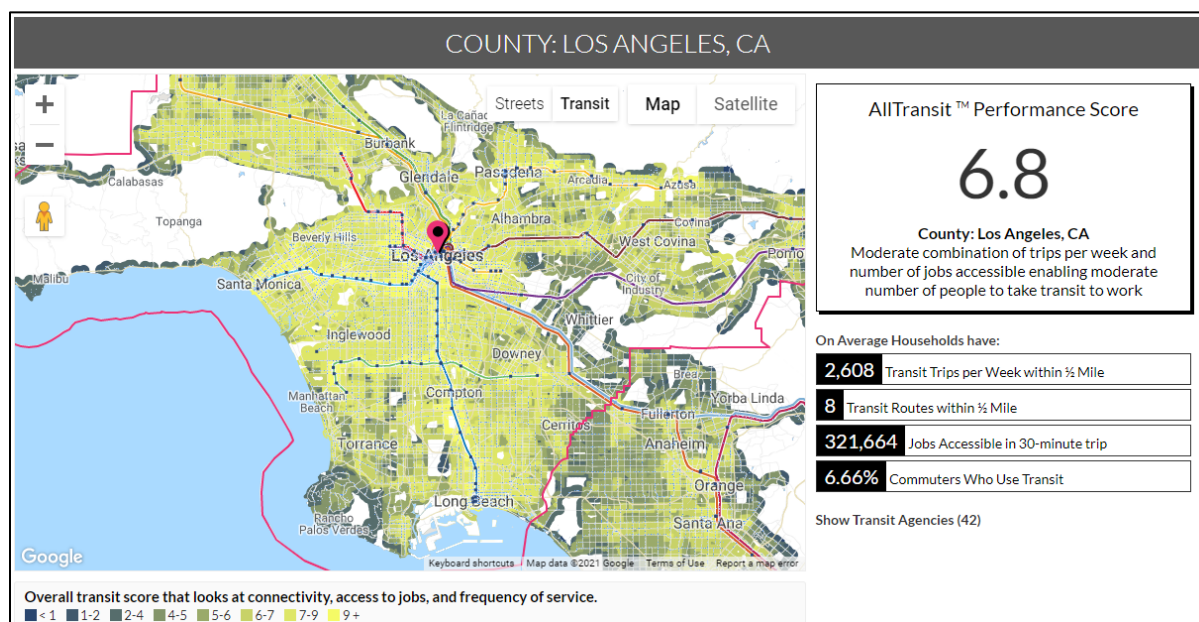
Transportation

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HQTAs) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. This section also utilizes All Transit metrics to identify transportation opportunities in Los Angeles County and Bradbury.

Regional Trend

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service.⁸ Bradbury's All Transit Performance score of 4.0 is the lowest among the surrounding jurisdictions of Monrovia (5.6), Arcadia (6.8), Duarte (7.2), and Azusa (7.8) as well as the County (6.8). Los Angeles County All Transit metrics are shown in [Figure 24](#). The County's All Transit score of 6.8 indicates a moderate combination of trips per week and number of accessible jobs enabling a moderate number of people to take transit to work. All Transit estimates 93.9 percent of jobs and 90.1 percent of workers are located within ½ a mile from transit.

Figure 24: Los Angeles County All Transit Metrics

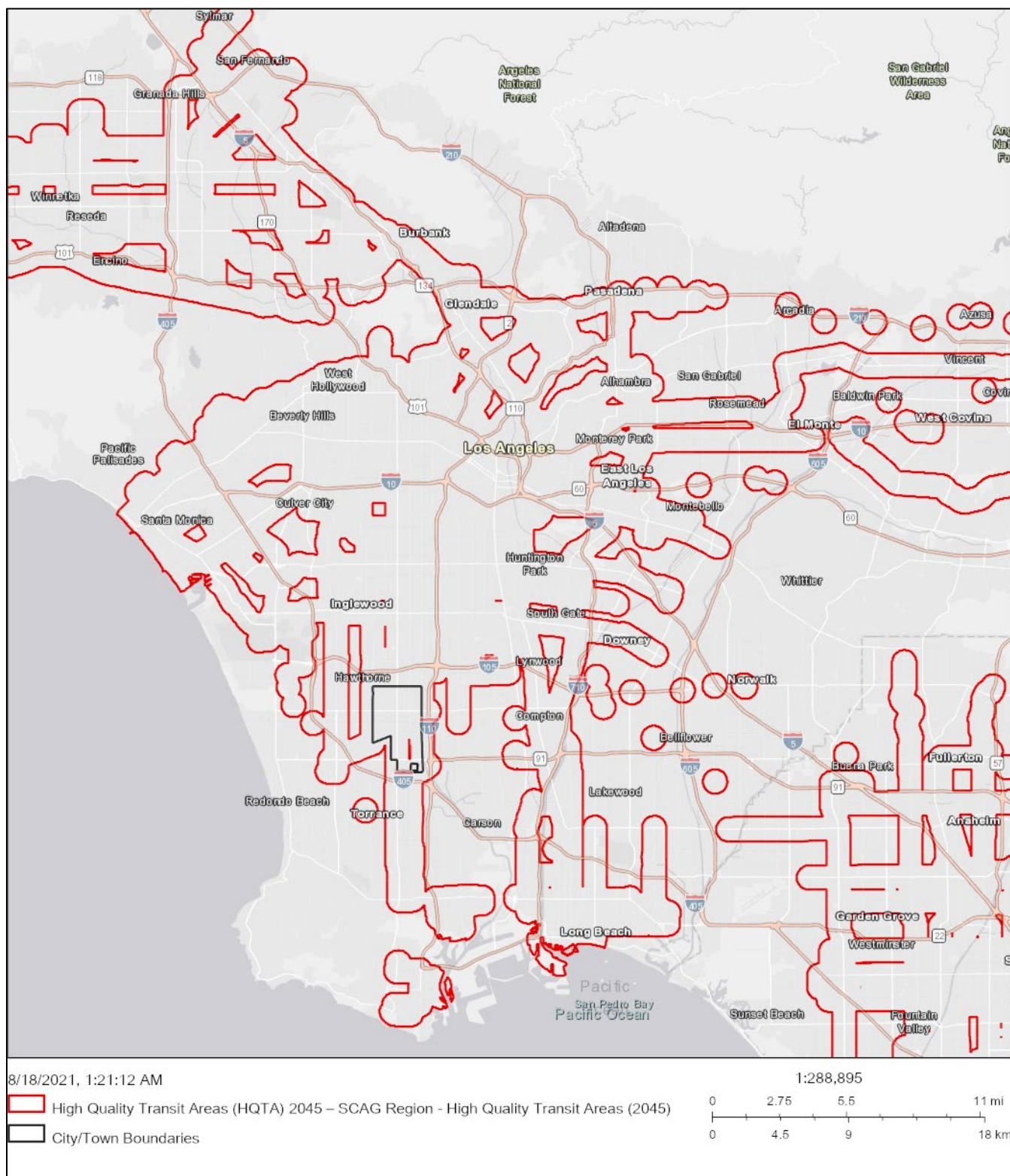


Source: All Transit Metrics: All Transit Performance Score – Los Angeles County, 2019.

Most of the central County areas and San Fernando Valley are considered High Quality Transit Areas (HQTAs) ([Figure 25](#)). In the San Gabriel Valley, there are HQTA gaps in the communities along the Los Angeles National Forest including Altadena, Sierra Made, Monrovia, and Bradbury as well as inland communities around the City of San Gabriel.

⁸ AllTransit. 2019 Metrics: AllTransit Performance Score. <https://alltransit.cnt.org/>. Accessed August 2021.

Figure 25: High Quality Transit Areas (HQTAs)

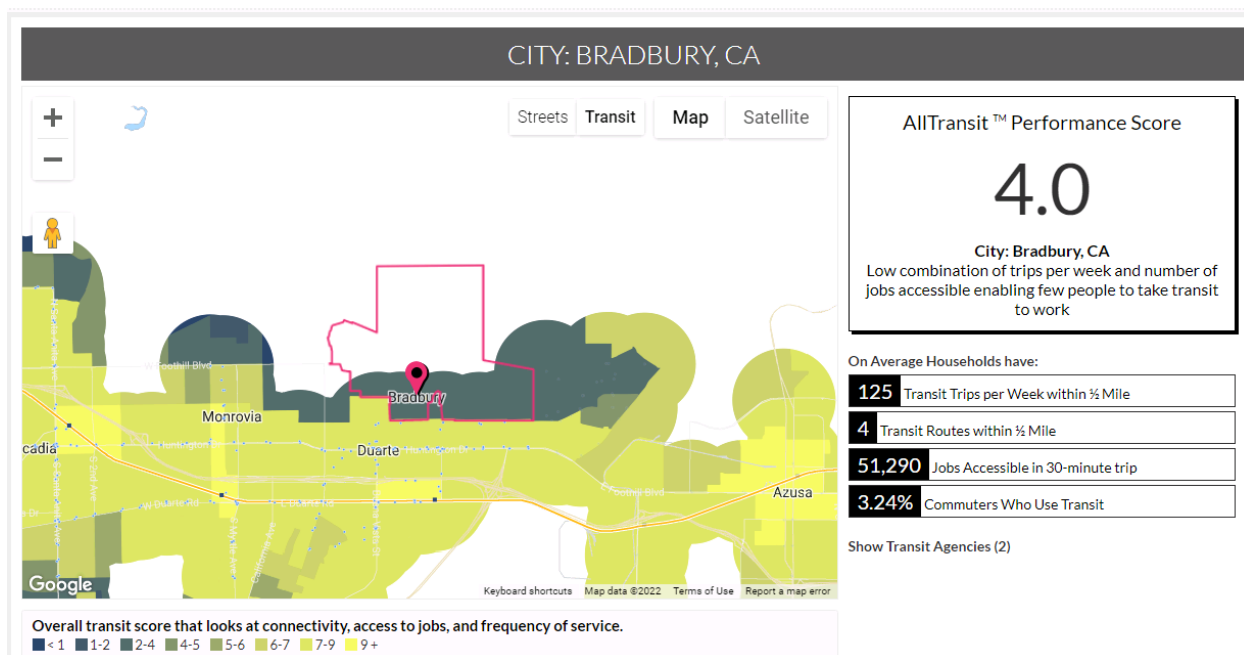


Source: SCAG HQTAs database, 2021

Local Trend

All Transit metrics for Bradbury are shown in [Figure 26](#). Bradbury received an All Transit Performance Score of only 4.0, indicating a low combination of trips per week and number of jobs accessible by transit. All Transit estimates that only 36.9 percent of jobs and 36.9 percent of workers in Bradbury live within ½ a mile from transit. All Transit also gave Bradbury a Transit Connectivity Score of three (out of 100) based on the number of bus routes and train stations within walking distance for households in a given Block Group scaled by the Frequency of Service.

Figure 26: Bradbury All Transit Metrics



Source: All Transit Metrics: All Transit Performance Score – Bradbury.

Persons with disabilities can use Monrovia Transit’s Dial-A-Ride Program. The Program’s service area includes the City of Monrovia, Bradbury, unincorporated parts of Los Angeles County adjacent to Monrovia, and Target in Duarte (a designated transfer point to Duarte Transit). Monrovia Transit also takes passengers to medical appointments at physician’s offices within three miles of the City’s limits, as well as City of Hope.

Based on HUD Opportunity Indicators shown in [Table 14](#), Bradbury residents are less likely to use public transit (lower transit index value) and they have higher transportation costs (lower low transportation cost index value). [Table 17](#) shows that Bradbury residents have a higher number of vehicles available, though they use cars, trucks, or van at the same frequency as Los Angeles County residents. According to the 2015-2019 estimates, only 4.5 percent of Bradbury residents use public transit to go to work (slightly lower than Los Angeles County’s share).

Table 17: Means of Transportation

	Los Angeles County	Bradbury
Vehicles Available		
No vehicle	3.9%	2.5%
1-2 vehicles	59.0%	31.0%
3 or more vehicles	37.2%	66.6%
Means of Transportation to Work		
Car, truck, or van	83.5%	82.7%
Public transportation (excluding taxicab)	5.8%	4.5%
Walked	2.7%	0.0%
Source: 2015-2019 ACS (5-year Estimates)		

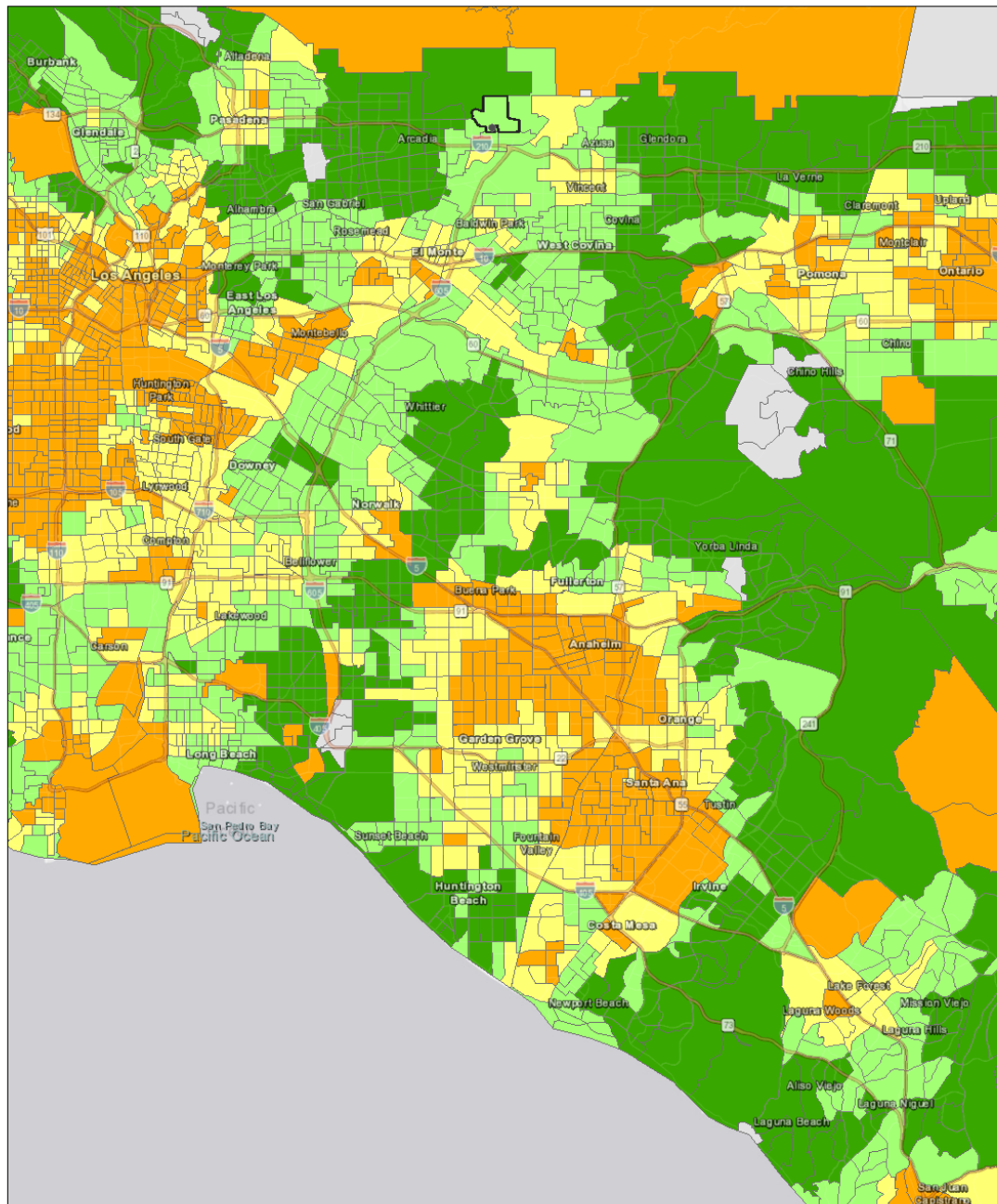
Education

As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates.

Regional Trend

TCAC Opportunity Map education scores for the region are shown in [Figure 27](#). The central County areas have the highest concentration of tracts with education scores in the lowest percentile. There is also a concentration of tracts with low education scores in San Gabriel Valley cities east of Covina. Areas around Burbank/La Cañada Flintridge, Arcadia, Glendora, La Verne, and Covina in the San Fernando Valley, Whittier, and North orange County have the highest education scores.

Figure 27: Regional TCAC Opportunity Areas – Education Scores



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)

No Data

1:288,895

0 2.75 5.5 11 mi
0 4.5 9 18 km

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CA HCD

City of Anaheim, City of Fullerton, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI,

Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Local Trend

Bradbury has an Education Score of 0.60, falling in the upper quantiles (between 0.50 and 0.75) shown in [Figure 27](#). According to the 2019 ACS, there are 178 persons over the age of 3 enrolled in school of which 57 percent are in Kindergarten through 12th grade and 38 percent are in college, graduate, or professional school.

Bradbury's student population is served by the Duarte Unified School District (DUSD). DUSD serves approximately 4,000 students from the communities of Bradbury, Duarte, and the Los Angeles County area known as South Monrovia Island as well as 86 cities from across Southern California. The district is comprised of a child development center with three preschool campuses, one TK-6 campus, four TK-8 theme-based academies, one comprehensive high school (9-12), an alternative high school, and the public charter school California School of the Arts-San Gabriel Valley, the first sister school of the prestigious Orange County School of the Performing Arts. The district has recently undergone a grade-level reconfiguration, transforming itself into a premier regional school district, serving students from the entire San Gabriel Valley region.

Greatschools.org is a non-profit organization that collect and analyze data from all 51 state departments of education and the federal government to provide analysis, insights, and school quality ratings for parents, partners, researchers, and policymakers. Their website provides a range of information including themed ratings that each reflect important factors in how students experience school, including how well schools serve students from different racial, ethnic, and socioeconomic backgrounds, how much students are improving within a school year, performance on state tests, and how well schools prepare students for college. GreatSchools.org also provides a Summary Rating calculation is based on four ratings: the Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is "below average", 5-6 indicate "average", and 7-10 are "above average."

According to GreatSchools.org, DUSD has a mixed record of Summary Rating, with a third of its schools scoring in the "below average" rating, a third in its "average" rating, and another third in its "above average" rating. [Figure 28](#) shows the location and scores of DUSD's seven schools and [Table 18](#) show details of the summary ratings.^{9,10} None of the schools are located in Bradbury. There also appears to be a trend that schools with higher ratings have larger shares of Asian and White populations, though this may reflect the area's overall demographics. However, schools with a higher population of lower income students also tended to score lower.

⁹ Mt Olive Innovation and Technology High (shown in grey) has not been scored yet.

¹⁰ Great Schools only listed seven of the nine schools in the Duarte Unified School District.

Figure 28: Great School Ratings- Duarte Unified School District Schools

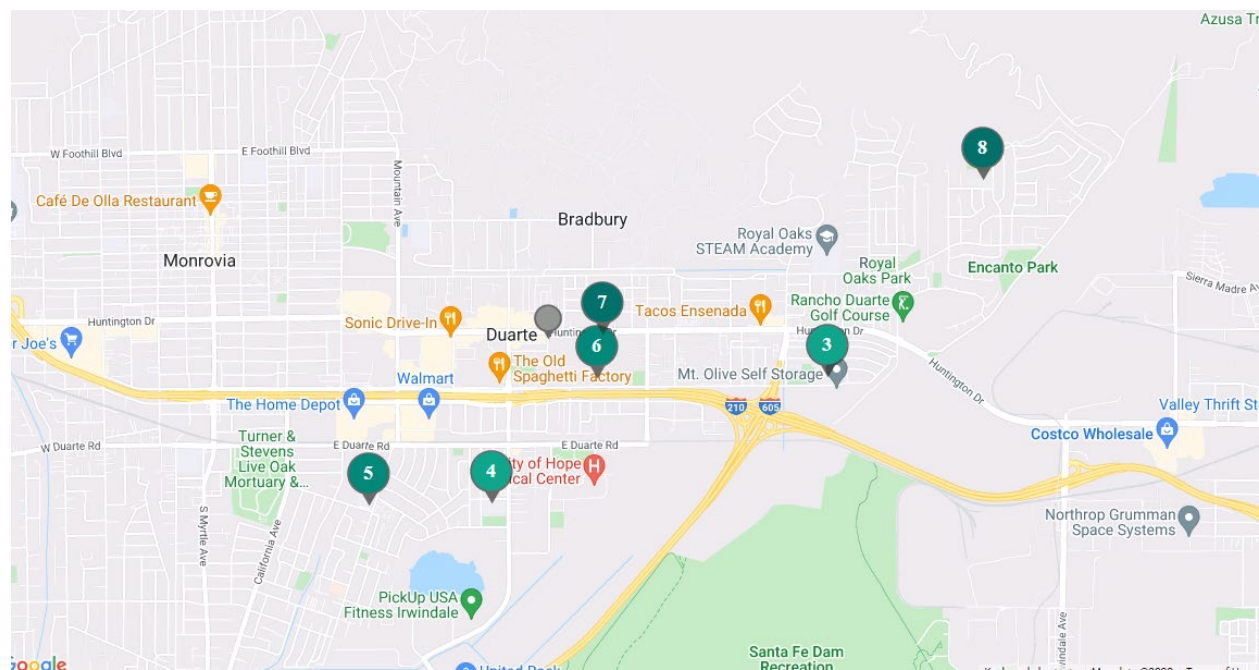


Table 18: Great Schools Detailed Summary Ratings

	Summary Rating	Testing Scores Rating	Academic Progress Rating	College Readiness	Equity Overview	Low Income	Asian	Hispanic	White
Valley View Elementary School	8	9	8		8	55.0%	6.0%	63.0%	20.0%
Royal Oaks Elementary School	7	8	7		7	47.0%	10.0%	58.0%	15.0%
Duarte High School	6	6		6	6	74.0%	3.0%	80.0%	7.0%
Maxwell Elementary School	5	5	5		4	86.0%	3.0%	86.0%	3.0%
Beardslee Dual Language Immersion Academy (Pk-8)	4	4	4		4	85.0%		91.0%	5.0%
Andres Duarte Elementary School	3	3	4		2	80.0%	3.0%	79.0%	6.0%
Mt. Olive Innovation and Technology High						90.0%		93.0%	1.0%
<p>Notes: The GreatSchools Test Score Rating reflects annual state test results for this school compared with scores statewide. The Academic Progress Rating helps measure how much students learn in a year, compared to their peers across the state. The GreatSchools College Readiness Rating shows how well students at this school are prepared for college compared to students at other schools in this state, based on key measures, like graduation rates, college entrance tests and AP coursework when available. The Equity Overview Rating looks at how well this school is serving the needs of its disadvantaged students relative to all its students, compared to other schools in the state, based on test scores provided from the state Department of Education. Source: Greatschools.org https://www.greatschools.org/california/duarte/duarte-unified-school-district/schools/?sort=rating&tableView=Academic&view=table</p>									

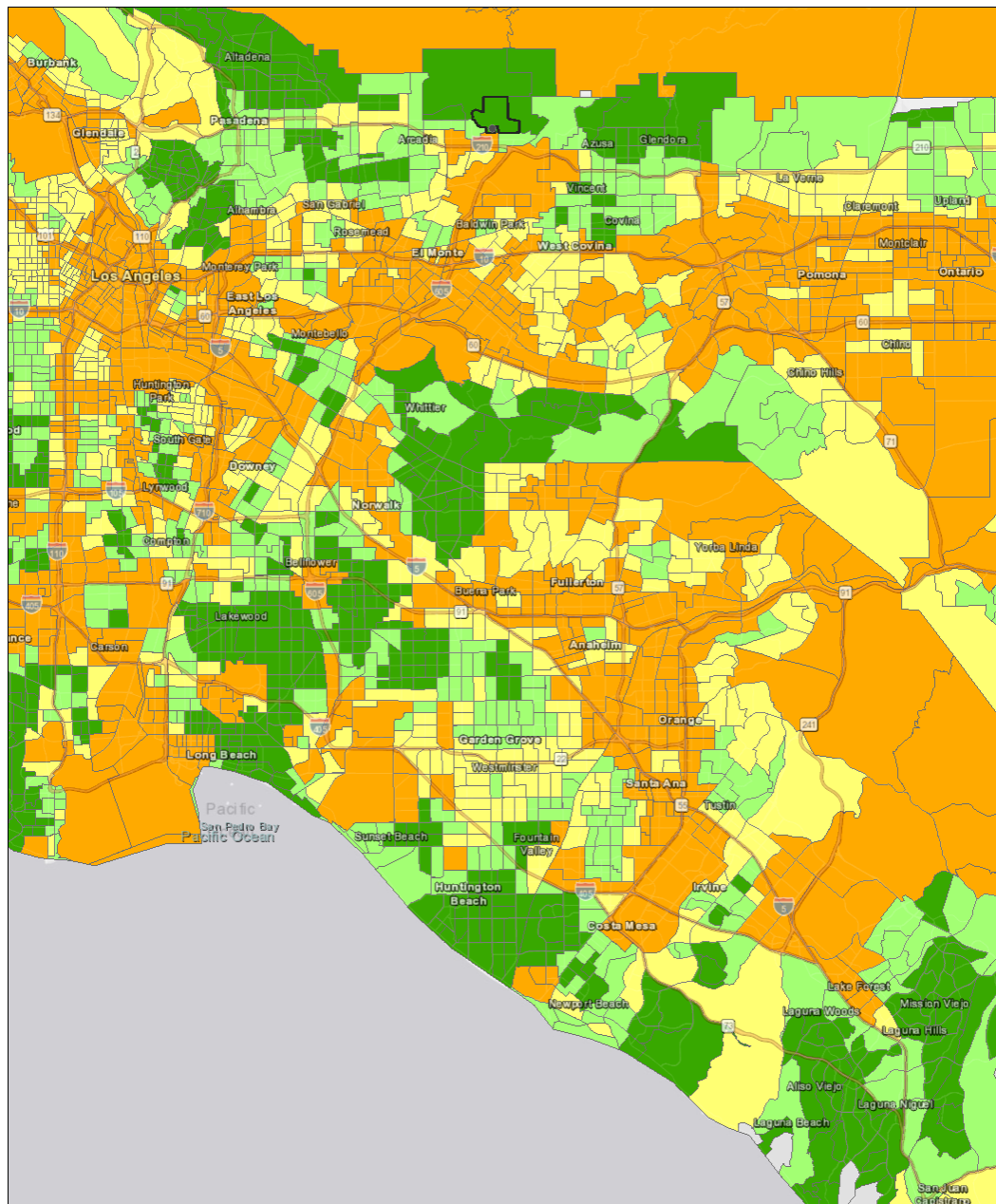
Environmental

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to considering (1) environmental factors such as pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure and (2) sensitive receptors, including seniors, children, persons with asthma, and low birth weight infants, CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. CalEnviroScreen Scores are reported as percentiles, where lower percentiles represent lower pollution burdens and lower socioeconomic vulnerability to pollution. However, for the TCAC Environmental Score, CalEnviroScreen 3.0 values are represented in a 0-1 scale and represent inverse trends, where the lower scores represent “less positive outcomes” and higher scores represent “more positive outcomes.”

Regional Trend

A larger proportion of Los Angeles County has environmental scores in the lower end compared to economic and education scores ([Figure 29](#)). Lower scores indicate “less positive environmental outcomes” and thus lower environmental quality. The central Los Angeles County, San Gabriel Valley and San Fernando Valley areas near Burbank all have concentrations of tracts with environmental scores in the lowest ends. Tracts with the highest environmental scores (higher environmental quality) are in the San Gabriel Valley communities along the Los Angeles National Forest (Altadena, Pasadena, Arcadia, Bradbury, Azusa, Glendora, Covina, La Verne) as well as in the Los Angeles County inland community of Whittier and Lakewood. Los Angeles County and Orange County beach communities in Long Beach, Huntington Beach, and South Orange County also have high environmental scores.

Figure 29: Regional TCAC Opportunity Areas – Environmental Scores



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Environmental Score - Tract

< .25 (Less Positive Environmental Outcomes)

.25 - .50

.50 - .75

.75 - 1 (More Positive Environmental Outcomes)

No Data

1:288,895

0 2.75 5.5 11 mi
0 4.5 9 18 km

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CA HCD
City of Anaheim, City of Fullerton, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI,

Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

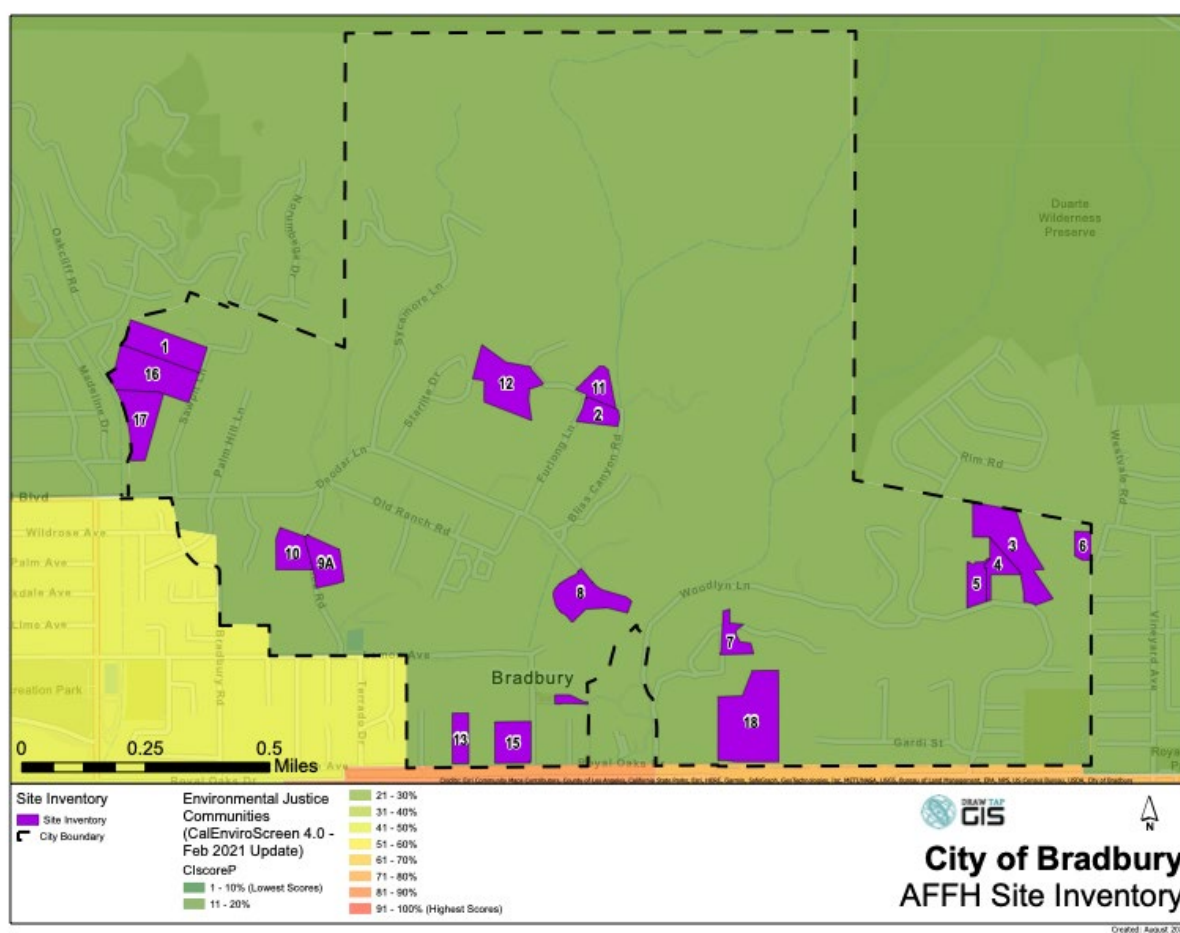
Local Trend

Figure 29 shows that the City of Bradbury scores in the highest scoring range for environmental quality (between 0.75 and 1). Its actual environmental score is 0.88.

Sites Inventory

The Office of Environmental Health Hazard Assessment has released updated scores in February 2020 (CalEnviroScreen 4.0). As explained above, the CalEnviroScreen 4.0 scores in Figure 30 are based on percentiles where lower percentile scores represent lower pollution burdens and lower socioeconomic vulnerability to pollution while higher percentile scores represent higher pollution burdens and higher socioeconomic vulnerability to that pollution. Thus, higher percentile scores identify tracts disproportionately affected by pollution, otherwise known as environmental justice communities. Figure 30 shows that that Bradbury's census tract has one of the lowest percentile scores while it is surrounded by mid- and high- percentile scores along its southern borders. Based on the CalEnviroScreen 4.0 scores, all RHNA units are located in a tract with lowest environmental pollution exposure and lowest share of socioeconomic vulnerable communities.

Figure 30: Distribution of RHNA Units by CalEnviroScreen 4.0 Percentile (2020)



Summary of Fair Housing Issues- Access to Opportunities

Bradbury is a one census-tract City considered to having the highest resources according to the TCAC opportunity maps. While geographical differences in access to resources could not be determined, there is a Citywide need for increased access to transportation and increased jobs proximity. Bradbury residents have limited access to public transportation and have longer commutes to work than Countywide residents.

Differences in access to education appear to be more likely related to income and race/ethnicity than geographical location. According to Great Schools' Equity Scoring, schools with larger shares of minority student population and lower income population scored lower.

5. Disproportionate Housing Needs

Housing problems for Bradbury were calculated using HUD's 2022 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2014-2018 ACS. **Error! Reference source not found.** breaks down households by race and ethnicity and presence of housing problems for Bradbury and Los Angeles County households. The following conditions are considered housing problems:

- Substandard Housing (measured by incomplete plumbing or kitchen facilities)
- Overcrowding (more than 1 person per room)
- Cost burden (housing costs greater than 30 percent)

According to CHAS data based on the 2014-2018 ACS, approximately 32 percent of Bradbury households experience housing problems, compared to 51 percent of households in Los Angeles County ([Table 19](#)). In Bradbury, 34 percent of owner-occupied households and 24 percent of renter-occupied households have one or more housing problems. The City has a lower proportion of owner and renter households with housing problems compared to the County, where 38 percent of owner-occupied households and 52 percent of renter-occupied households experience a housing problem. Bradbury differs from the commonly seen trend of renter households experiencing housing problems at a higher rate than owner households seen in most jurisdictions, including Countywide. In Bradbury, White renter-households and Hispanic owner-households experience housing problems at the highest rate (more than two thirds of households).

Table 19: Housing Problems by Race/Ethnicity

Race/Ethnicity	Bradbury			Los Angeles County		
	Owner	Renter	All Households	Owner	Renter	All Households
White	29.8%	63.6%	34.4%	31.9%	62.8%	41.3%
Black	0.0%	Note 1	0.0%	41.2%	56.0%	55.6%
Asian	40.2%	0.0%	28.7%	37.7%	59.1%	46.2%
American Indian	Note 2	Note 2	Note 2	37.6%	53.9%	50.0%
Pacific Islander	Note 2	Note 2	Note 2	42.3%	70.2%	49.8%
Hispanic	66.7%	0.0%	50.0%	46.9%	61.9%	61.3%
All	33.9%	24.1%	32.0%	38.4%	52.4%	51.1%

Notes:

1. CHAS data estimated there no Black renter households.

2. CHAS data estimated there were no American Indian or Pacific Islander households in the City.

Source: HUD CHAS Data (based on 2014-2018 ACS), 2022.

Cost Burden

Households are considered cost burdened if housing costs exceed 30 percent of their gross income for housing, and severely cost burdened if housing costs exceed 50 percent of their gross income. Cost burden in Bradbury and Los Angeles County is assessed using 2022 HUD CHAS data (based on 2014-2018 ACS estimates) and the HCD Data Viewer (based on 2010-2014 and 2015-2019 ACS estimates).

Regional Trend

Cost burden by tenure and race/ethnicity for Los Angeles County is shown in [Table 20](#). Approximately 45 percent of Los Angeles County households are cost burdened, including 34 percent of owner-occupied households and 53 percent of renter-occupied households. Black and Hispanic renter households have the highest rate of cost burden of 59 percent and 57 percent, respectively. White, Pacific Islander, and Asian owner-households have the lowest rate of cost burden (31, 34, and 34 percent, respectively), lower than all owner households and all households in the County. Cost burden is more common amongst renter households than owner households regardless of race or ethnicity.

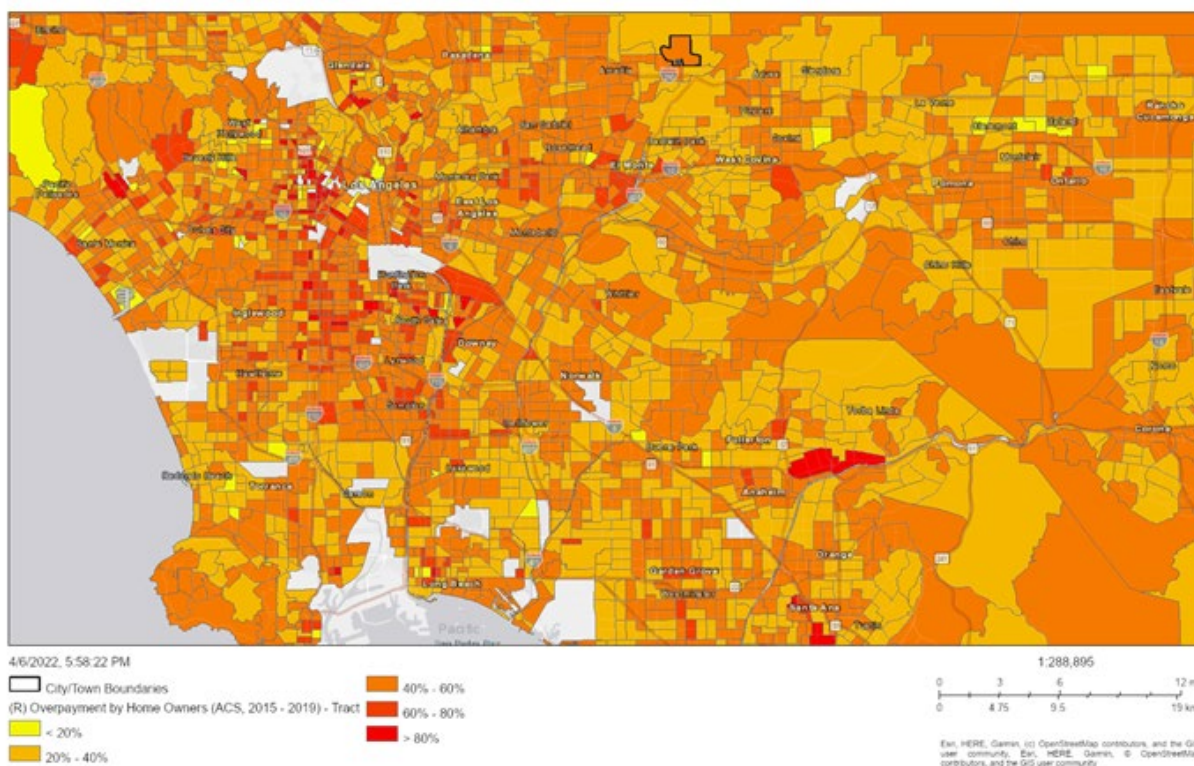
About 23 of Los Angeles County households are severely cost burdened. Severe cost burdens follow similar trends as cost-burdens, a higher share of renter households experience severe cost burdens than owner households and Black, Pacific Islander, and Hispanic households have the highest rates of severe cost burdens. [Figure 31](#) and [Figure 32](#) show that renter concentration is more severe (a higher concentration of renters per tract is cost burdened) and both owner and renter cost burdened households are concentrated in the City of Los Angeles, especially the southern communities of Inglewood and Compton as well as in EL Monte, West Covina, and Pomona in the San Gabriel Valley.

Table 20: Cost Burden by Race/Ethnicity – Los Angeles County

	White	Black	Asian	Amer. Ind,	Pacific Islr.	Hispanic	Other	All
Cost Burden >30%								
Owner	30.8%	39.8%	33.9%	36.0%	33.8%	38.0%	34.4%	34.3%
Renter	49.2%	59.0%	47.5%	51.7%	45.3%	57.2%	49.8%	53.5%
All HH	39.2%	52.6%	40.3%	45.0%	41.3%	49.8%	43.8%	44.7%
Severe Cost Burden (>50%)								
Owner	14.6%	20.2%	15.8%	12.8%	16.9%	16.7%	17.6%	15.9%
Renter	27.1%	34.4%	25.5%	30.7%	20.4%	29.5%	27.0%	28.8%
All HH	20.3%	29.6%	20.3%	23.1%	19.2%	24.6%	23.3%	22.9%

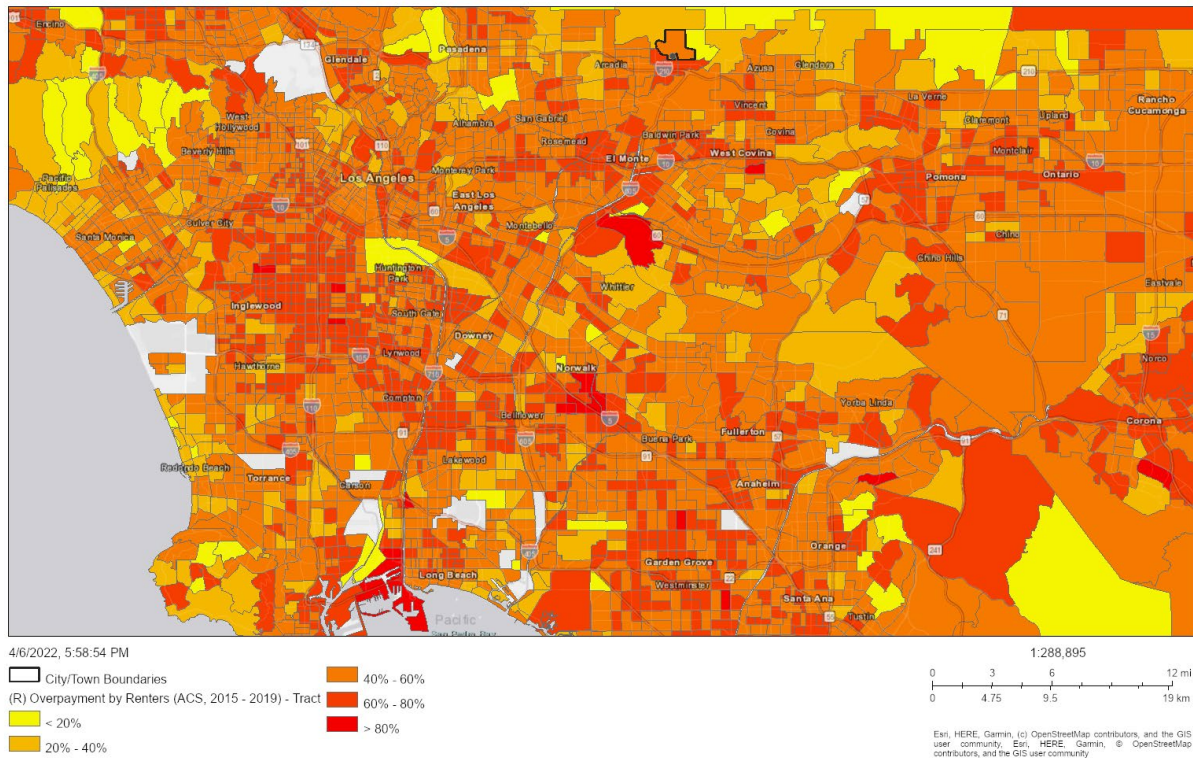
Source: HUD CHAS Data (based on 2014-2018 ACS), 2022.

Figure 31: Regional Homeowner Cost Burden



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, CA HCD

Figure 32: Regional Renter Cost Burden



Source: HCD AFFH Data Viewer, HUD CHAS data, 2022.

Local Trend

Cost burden by tenure based on HUD CHAS data is shown in [Table 21](#). Hispanic households highest rate of cost burden in the city (50 percent). Asian households have the lowest incidence of cost burden (29 percent). Overall, a third of Bradbury households are cost burdened, and 15 percent are severely cost burdened. Like stated earlier, Bradbury differs from County trends where renters have higher rates of cost burden. In Bradbury, over 33 percent of owner households are cost burdened compared to 17 percent of renter households. Of note is that about 41 percent of Asian owner households (31 households) and 100 percent of Hispanic owner household (households) experienced cost burdens.

Table 21: Cost Burden by Race/Ethnicity – Bradbury

	White	Black	Asian	Amer. Ind,	Pacific Islr.	Hispanic	Other	All
Cost Burden >30%								
Owner	28.6%	0.0%	41.2%	Note 2	Note 2	100.0%	0.0%	33.3%
Renter	50.0%	Note 1	0.0%	Note 2	Note 2	0.0%	Note 3	16.9%
All HH	31.3%	0.0%	29.2%	Note 2	Note 2	50.0%	0.0%	30.1%
Severe Cost Burden (>50%)								
Owner	7.1%	0.0%	23.5%	Note 2	Note 2	100.0%	0.0%	14.3%
Renter	50.0%	Note 1	0.0%	Note 2	Note 2	0.0%	Note 3	16.9%
All HH	12.5%	0.0%	16.7%	Note 2	Note 2	50.0%	0.0%	14.9%
Notes								
1. CHAS data estimated there no Black renter households.								
2. CHAS data estimated there were no American Indian or Pacific Islander households in the City.								
3. CHAS data estimated there were no “Other” race/ethnicity renter households.								
Source: HUD CHAS Data (based on 2014-2018 ACS), 2022.								

The SCAG Pre-Certified Local Housing Data profile for Bradbury also provided a breakdown of the share of cost burdened households by income. [Table 22](#) shows that low and moderate income households are more likely to be cost-burdened than above moderate households. About 60 of households earning less than 100% AMI (moderate income) experience cost burdens (with the exception of very low income households).

Table 22: Cost Burden by Income- Bradbury

Income	# Cost Burdened (>30%AMI)	% Cost Burdened
< 30% HAMFI	12	60.0%
30-50% HAMFI	8	30.8%
50-80% HAMFI	20	62.5%
80-100% HAMFI	18	60.0%
> 100% HAMFI	55	26.6%
Total Households	113	35.9%
Source: SCAG Pre-Certified Local Housing Data Profile, Bradbury. April 2021.		

Sites Inventory

Figure 33 and Figure 34 show the distribution of RHNA units by overpayment of owners and renters, respectively. These figures are based on 2015-2019 ACS data. All RHNA units are distributed in a census tract where cost burden for both owners and renters is between 40 and 60 percent.¹¹

¹¹ Differences in the percentages of cost burdened owner and renter households between [Table 21](#) and [Figure 33](#) and [Figure 34](#) may be due to differences in the years sampled (ACS 2014-2018 and ACS 2015-2019). In addition, [Figure 33](#) and [Figure 34](#) show 1) the percent of owner households with Mortgages whose Monthly Owner Costs are 30.0

Figure 33: RHNA Units by Overpayment by Homeowners

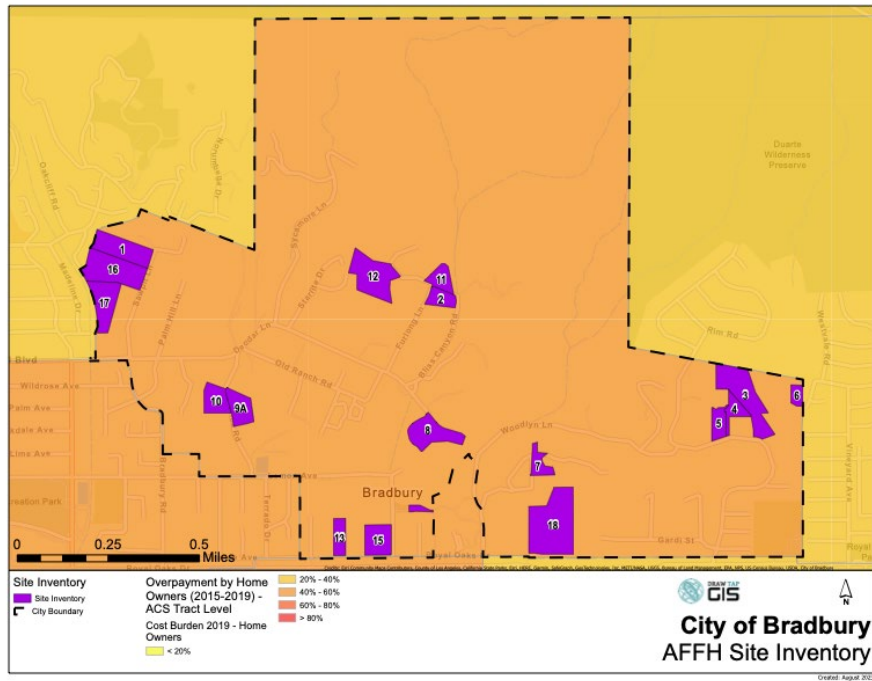
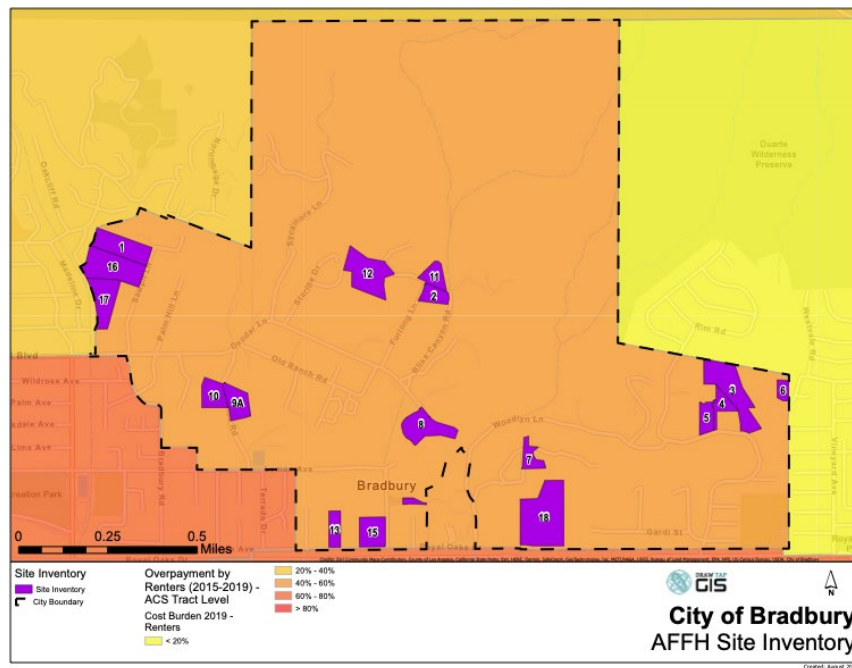


Figure 34: RHNA Units by Overpayment by Renters



Percent or More of household income and 2) the percent of renter households for whom *Gross Rent (Contract Rent Plus Tenant-Paid Utilities)* is 30.0 Percent or More of Household Income. Meanwhile, CHAS does not specify if cost burdens are calculated based on gross rents plus tentant utilities.

Overcrowding

A household is considered overcrowded if there is more than one person per room and severely overcrowded if there is more than 1.5 persons per room. HUD CHAS data based on the 2014-2018 ACS and the HCD AFFH Data Viewer (2015-2019 ACS) is used to show overcrowding in Bradbury and Los Angeles County.

Regional Trend

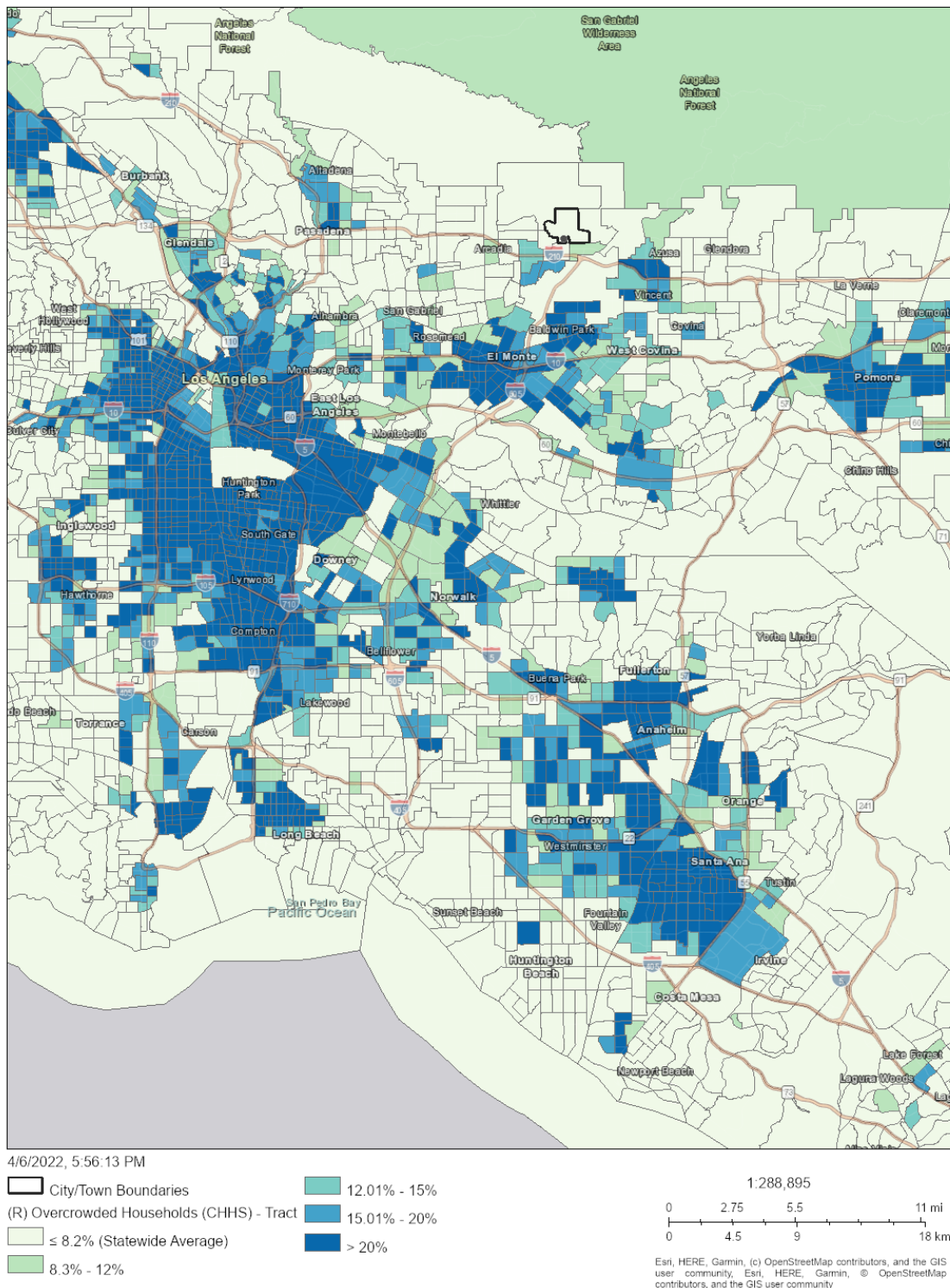
As shown in [Table 23](#), 5.5 percent of owner-occupied households and 16.2 percent of renter-occupied households throughout the County are overcrowded. Severe overcrowding is also an issue in the County, especially amongst renter households. Over one percent of owner households and 7.6 percent of renter households are severely overcrowded.

[Figure 35](#) shows concentrations of overcrowded households by tract regionally. Overcrowded households are most concentrated in the central County areas, including the City of Los Angeles, South Gate, and Compton, and in parts of the San Gabriel Valley in EL Monte, Baldwin Park, and Pomona.

Table 23: Overcrowding by Tenure- Los Angeles County

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
Los Angeles County					
Owner-Occupied	84,291	5.5%	22,594	1.5%	1,519,516
Renter-Occupied	291,621	16.2%	134,455	7.5%	1,797,279
Source: HUD CHAS Data (based on 2014-2018, 2022).					

Figure 35: Regional Overcrowding



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: HCD AFFH Data Viewer, HUD CHAS data, 2022.

Local Trend

Table 23 below, shows that there are no renter or owner households considered overcrowded or severely overcrowded in the City.

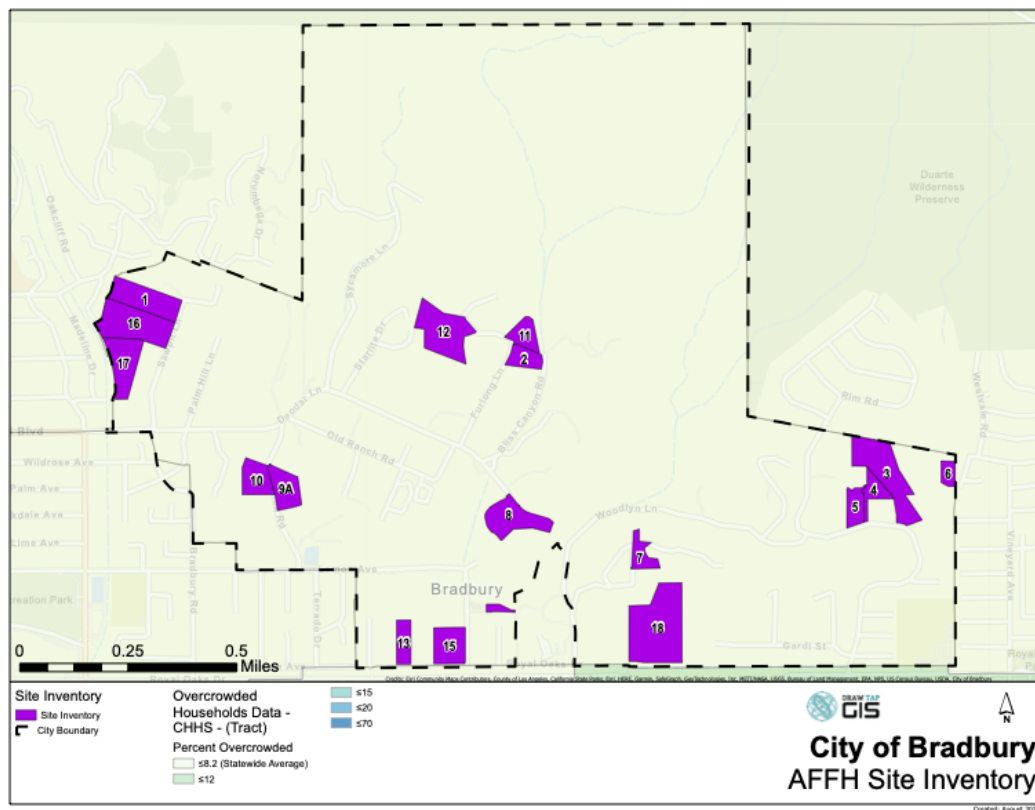
Table 24: Overcrowding- Bradbury

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
Bradbury					
Owner-Occupied	0	0.0%	0	0.0%	219
Renter-Occupied	0	0.0%	0	0.0%	51
Source: HUD CHAS Data (based on 2014-2018, 2022).					

Sites Inventory

Figure 36 shows the RHNA distribution by the percentage of overcrowded households by tracts in the City of Bradbury. Since the City is made up of a single tract, all RHNA units are located in a census tract with less than 8.2 percent overcrowded households. As stated above, there are zero overcrowded households in the City so more accurately, none of the RHNA units are located in a tract with overcrowded households.

Figure 36: RHNA Units by % Overcrowding



Substandard Housing

Incomplete plumbing and kitchen facilities, lack of telephone access, and housing age can be used to measure substandard housing conditions. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs.

Regional Trend

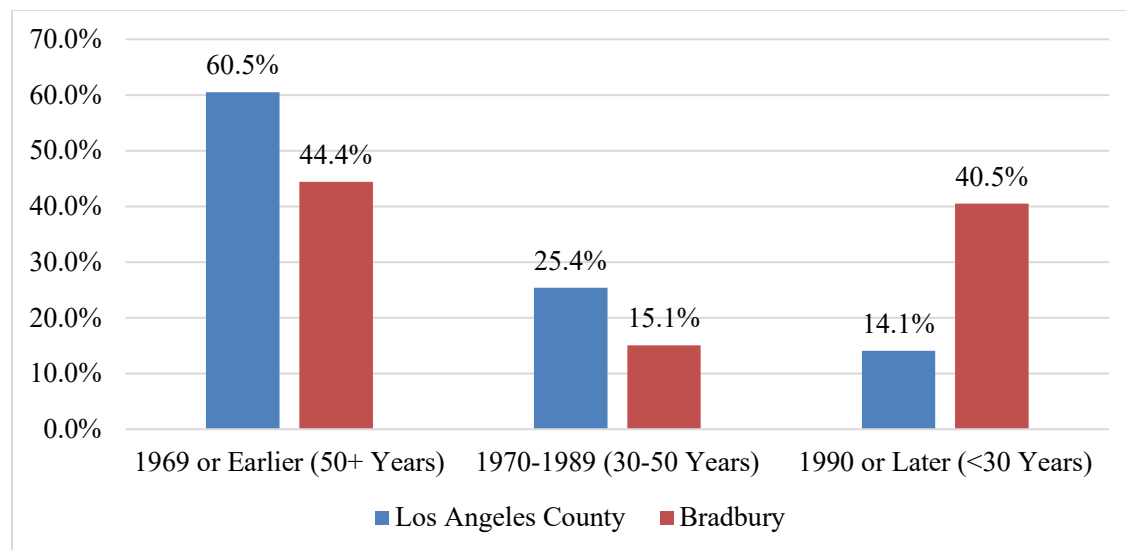
Less than two percent of Los Angeles County households live in substandard conditions, lacking complete kitchen and plumbing facilities or phone services ([Table 25](#)). A higher share of renter households lack complete facilities or phone access than owner-households. In addition, lacking complete kitchen facilities and phone access is more common than lacking complete plumbing facilities.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. In the County, 86 percent of the housing stock was built prior to 1990, including 60.5% built prior to 1970 ([Figure 37](#)).

Table 25: Substandard Housing- Los Angeles County and Bradbury

	Los Angeles County			Bradbury		
	Owner	Renter	All HH	Owner	Renter	All HH
Lacking complete kitchen facilities	0.4%	2.5%	1.5%	0.0%	5.9%	1.1%
Lacking plumbing facilities	0.2%	0.6%	0.5%	0.0%	0.0%	0.0%
No telephone service available:	0.9%	2.4%	1.7%	0.0%	0.0%	0.0%

Figure 37: Housing Age- Los Angeles County and Bradbury



Source: 2015-2019 American Community Survey (ACS) (5-Year Estimates).

Local Trend

Substandard conditions are rare in Bradbury, no households lack complete plumbing facilities or telephone service ([Table 25](#)). Only 1.1 percent of households lack complete kitchen facilities. Of the households that lack kitchen facilities, all (48 households) are renter households. This may be because of single-room occupancy units (SROs). In Bradbury, SROs are occupied by individuals providing on-site domestic services. For example, there are several properties in the City with maid's or groom's quarters located in or adjacent to the principal residence. These quarters are generally a single room with a bathroom, with limited or no kitchen facilities. The room is usually part of the compensation for the on-site worker, so no rent is charged.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. According to the 2015-2019 ACS, 60 percent of the housing stock in Bradbury was built prior to 1990 and may be susceptible to deterioration, including 44 percent built before 1970 which may require major repairs ([Figure 37](#)). In comparison, 86 percent of housing units Countywide was built prior to 1990.

Sites Inventory

Displacement Risk

HCD defines sensitive communities as "communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost." The following characteristics define a vulnerable community:

- The share of very low-income residents is above 20 percent; and
- The tract meets two of the following criteria:
 - Share of renters is above 40 percent,
 - Share of people of color is above 50 percent,
 - Share of very low-income households that are severely rent burdened households is above the county median,
 - The area or areas in close proximity have recently experienced displacement pressures (percent change in rent above County median for rent increases), or
 - Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Regional Trend

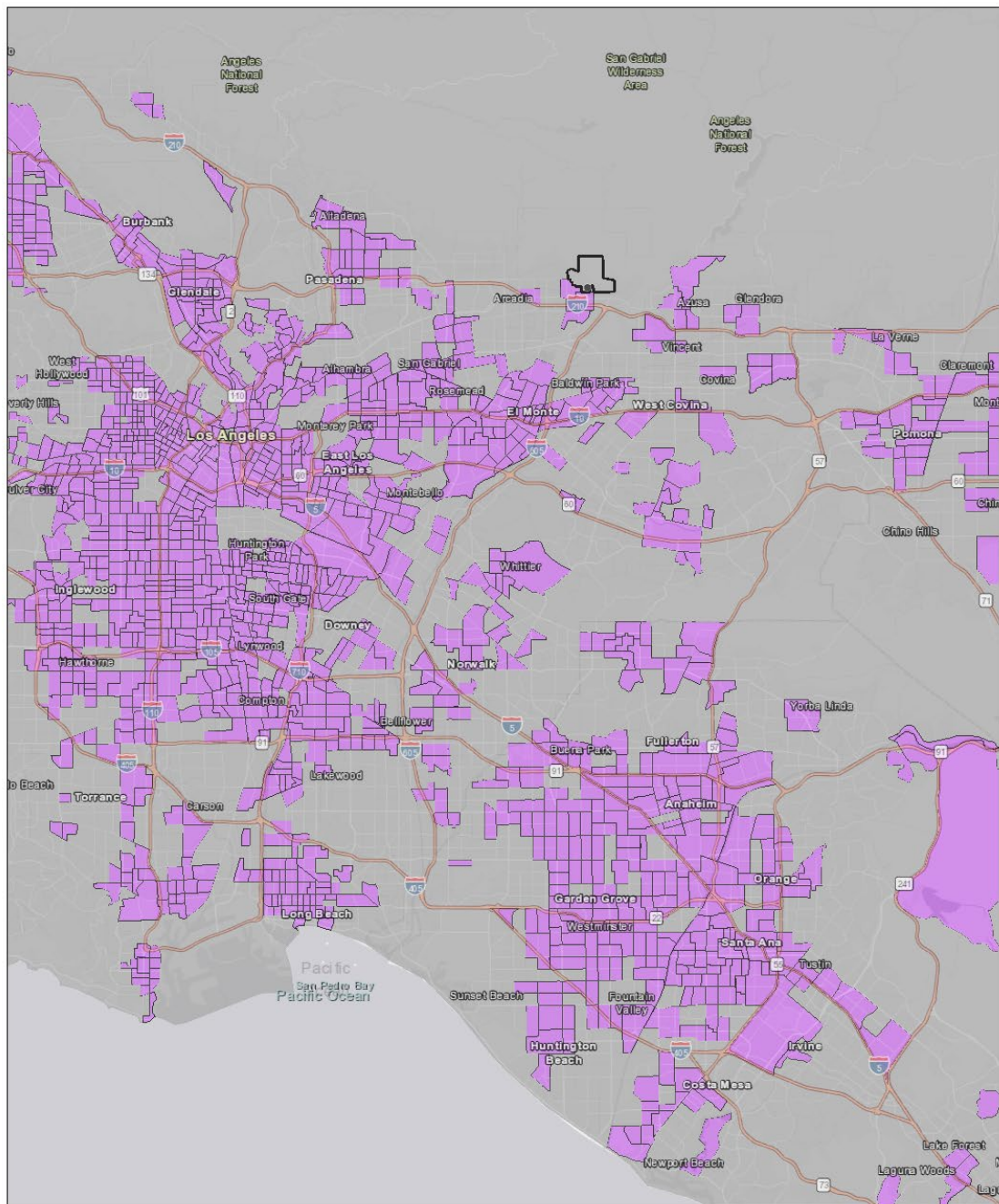
[Figure 38](#) shows sensitive communities at risk of displacement in the region. Vulnerable communities are most concentrated in the central County areas around the City of Los Angeles, Inglewood, South Gate, and Compton, East Los Angeles, and parts of the San Gabriel Valley in Pasadena, El Monte, Rosemead and in Pomona. Sensitive communities are also concentrated in inland North Orange County tracts.

Local Trend

As shown in [Figure 38](#), Bradbury is not considered a sensitive community. Despite being next to a tract considered a sensitive community (in Duarte and Monrovia), it is unlikely that Bradbury will be considered a sensitive community in the future given that it is not close to meeting any of the other characteristics of a vulnerable community, especially having a low share of very low -

income population (12 percent) and renter population (19 percent). These figures do not tend to change dramatically over a planning period.

Figure 38: Regional Sensitive Communities at Risk of Displacement



4/7/2022, 3:52:09 PM

 City/Town Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

 Vulnerable

Other

1:288,895

A number line with two scales. The top scale is labeled in miles (mi) with major tick marks at 0, 2.75, 5.5, and 11. The bottom scale is labeled in kilometers (km) with major tick marks at 0, 4.5, 9, and 18. There are also minor tick marks between the major ones: between 0 and 2.75 (at 1.125 and 1.875), between 2.75 and 5.5 (at 3.375 and 4.125), between 5.5 and 11 (at 6.875 and 8.375), and between 0 and 4.5 (at 1.5 and 3.0), and between 4.5 and 9 (at 6.0 and 7.5).

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD

County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, CA HCD

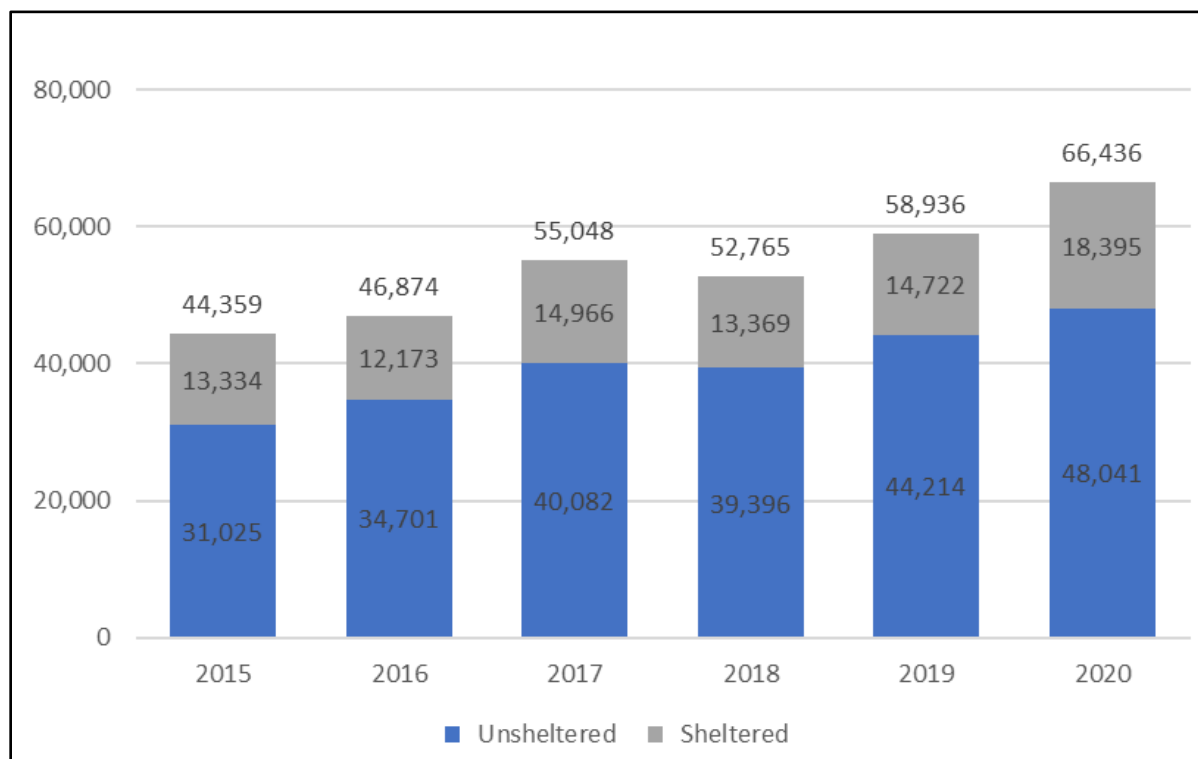
Source: HCD AFFH Data Viewer, Urban Displacement Project, 2021.

Homelessness

Regional Trend

The Los Angeles Homeless Services Authority (LAHSA) estimates there were 66,436 persons experiencing homelessness in the Los Angeles County, based on the 2020 Greater Los Angeles Homeless Point-in-Time (PIT) Count. [Figure 39](#) shows the Los Angeles County homeless populations from 2015 to 2020. Approximately 72 percent of the homeless population is unsheltered and 28 percent is sheltered. The homeless population has increased by nearly 50 percent since 2015, and 12.7 percent since 2019. According to Department of Finance (DOF) estimates, the entire Los Angeles County population grew by only 0.5 percent between 2015 and 2020.

Figure 39: Los Angeles County Homeless Population Trend (2015-2020)



Source: Los Angeles Homeless Services Authority (LAHSA), 2015-2020 LA County/LA Continuum of Care (CoC) Homeless Counts.

[Table 26](#) shows the homeless populations in 2019 and 2020 by population type, gender, and health/disability. Approximately 19 percent of the homeless population belongs to a family with one or more child, 38 percent are chronically homeless, and 22 percent have a serious mental illness. Since 2019, the population of homeless family members (+46 percent), persons experiencing chronic homelessness (+54 percent), persons fleeing domestic violence (+40 percent), non-binary/gender non-conforming persons (+326 percent), and persons with a substance use disorder (+104 percent) have increased the most drastically.

Table 26: Los Angeles County Homeless Population Demographics (2019-2020)

	2019		2020		Percent Change
	Persons	Percent	Persons	Percent	
Total	58,936	100.0%	66,436	100.0%	12.7%
Individuals	50,071	85.0%	53,619	80.7%	7.1%
Transitional Aged Youth (18-24)	3,635	6.2%	4,278	6.4%	17.7%
Unaccompanied Minors (under 18)	66	0.1%	74	0.1%	12.1%
Family Members*	8,799	14.9%	12,817	19.3%	45.7%
Veterans	3,878	6.6%	3,902	5.9%	0.6%
People Experiencing Chronic Homelessness	16,528	28.0%	25,490	38.4%	54.2%
Fleeing Domestic/Intimate Partner Violence	3,111	5.3%	4,356	6.6%	40.0%
Gender					
Male	39,348	66.8%	44,259	66.6%	12.5%
Female	18,331	31.1%	21,129	31.8%	15.3%
Non-Binary/Gender Non-Conforming	200	0.3%	851	1.3%	325.5%
Transgender	1,057	1.8%	197	0.3%	-81.4%
Health and Disability**					
Substance Use Disorder	7,836	13.3%	15,983	24.1%	104.0%
HIV/AIDS	1,306	2.2%	1,245	1.9%	-4.7%
Serious Mental Illness	13,670	23.2%	14,790	22.3%	8.2%
Percent of Total County Population	--	0.6%	--	0.7%	--
*Members of families with at least one child under 18. ** Indicators are not mutually exclusive. Source: Los Angeles Homeless Services Authority (LAHSA), 2019-2020 LA County/LA Continuum of Care (CoC) Homeless Counts.					

The data in [Table 27](#) refers to the Los Angeles Continuum of Care (CoC) region, covering all Los Angeles County jurisdictions except for the cities of Long Beach, Pasadena, and Glendale. Special needs groups identified include elderly, persons with disabilities (including developmental disabilities), and families.

Nearly 20 percent of the homeless population in the County are members of families with one or more child under the age of 18, 10 percent are elderly persons aged 62 and older, 17 percent have a physical disability, and eight percent have a developmental disability. While the majority of homeless families are sheltered (76 percent), most the homeless population with a developmental disability, physical disability, and elderly population is unsheltered.

Table 27: Homeless Populations and Special Needs Groups

Special Needs Group	Sheltered	Unsheltered	Total
Developmental Disability	32.1%	67.9%	5,292
Physical Disability	17.3%	82.7%	10,833
Family Members	76.3%	23.7%	12,416
Elderly (aged 62+)	21.5%	78.5%	6,290
Source: LAHSA, 2020 LA CoC Homeless Counts; 2015-2019 ACS (5-Year Estimates)			

[Figure 40](#) shows the Los Angeles CoC homeless population by race and ethnicity. The Hispanic/Latino, Black/African American, and White populations make up the largest proportions of the homeless population. The Black/African American population is the most overrepresented in the Los Angeles CoC region. Nearly 34 percent of homeless persons are Black or African American, compared to only 7.8 percent of the population countywide ([Table 28](#)). The American Indian and Alaska Native population is also overrepresented, making up only 0.2 percent of the County population, but 1.1 percent of the homeless population.

Figure 40: Los Angeles CoC Homeless Population by Race/Ethnicity

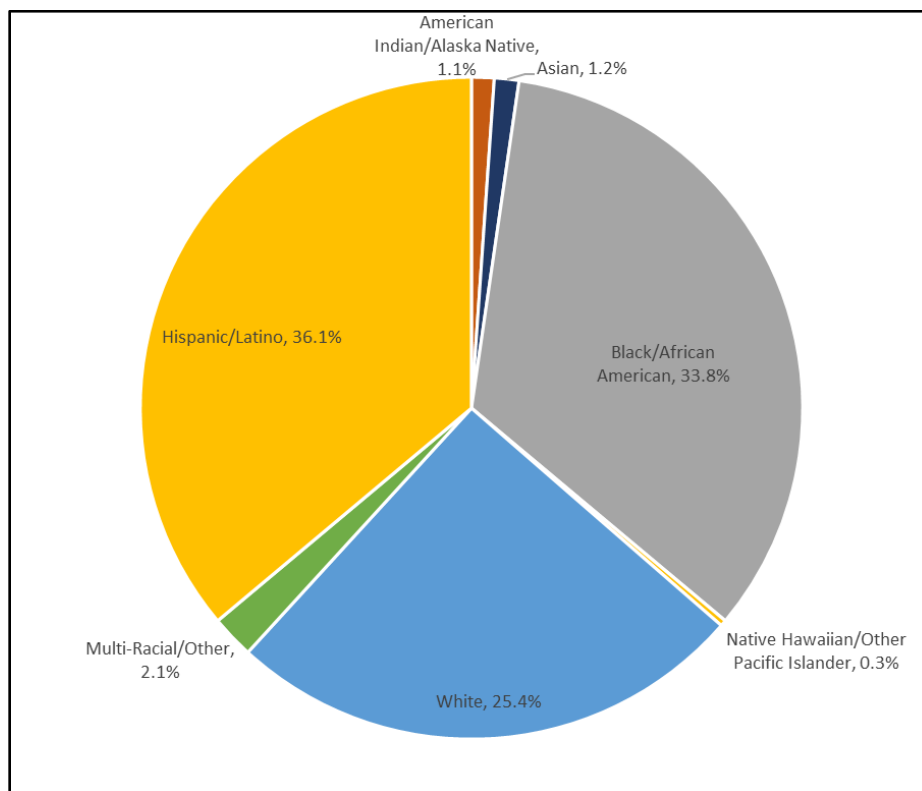


Table 28: Los Angeles CoC Homeless Population by Race/Ethnicity vs Total Population

Race/Ethnicity	Homeless Population		% LA County Population
	Persons	Percent	
American Indian/Alaska Native	686	1.1%	0.2%
Asian	774	1.2%	14.4%
Black/African American	21,509	33.8%	7.8%
Hispanic/Latino	23,005	36.1%	48.5%
Native Hawaiian/Other Pacific Islander	205	0.3%	0.2%
White	16,208	25.4%	26.2%
Multi-Racial/Other	1,319	2.1%	2.6%
Source: LAHSA, 2020 LA CoC Homeless Counts; 2015-2019 ACS (5-Year Estimates)			

[Figure 41](#) shows the distribution of homeless persons in the Los Angeles CoC region by age. Adults aged 25 to 54 make up most of the homeless population, followed by adults aged 55 to 61, and children under 18. Children account for 11.8 percent of the homeless population and seniors (age 62+) account for 9.9 percent of the population; 6.6 percent of the homeless population is transitional aged youths between the ages of 18 and 24. [Table 29](#) shows that adults age 25 to 62 are overrepresented in the homeless population.

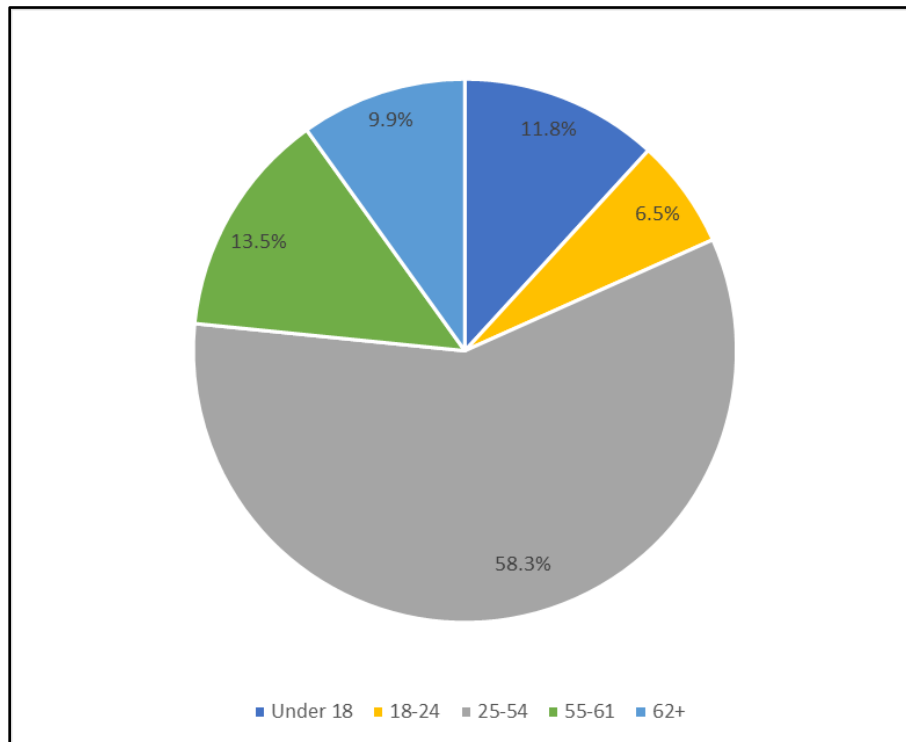
Figure 41: Los Angeles CoC Homeless Population by Age

Table 29: Los Angeles CoC Homeless Population by Age vs Total Population

Age	Homeless Population		% LA County Population
	Persons	Percent	
Under 18	7,491	11.8%	22.0%
18-24	4,181	6.6%	9.7%
25-54	37,138	58.3%	43.2%
55-61	8,606	13.5%	8.7%
62+	6,290	9.9%	16.4%
Source: LAHSA, 2020 LA CoC Homeless Counts; 2015-2019 ACS (5-Year Estimates).			

Local Trend

According to LASHA 2020 Homeless Point-in-Time Count, there are no individuals experiencing homelessness in Bradbury. However, in the San Gabriel Valley Service Provider Area (SPA-3) which includes Bradbury, the total homeless population increased from the 2019 count of 4,489 to 4,555 in 2020, a 1.5 percent increase ([Table 30](#)). The number of sheltered homeless in SPA-3 increased by approximately 331 persons between 2019 and 2020, whereas the count identified a decrease of 265 individuals who were unsheltered. Most of the homeless in SPA 3 are single adults and close to a third of the homeless population also have a mental illness and 20 percent have a physical disability.

Table 30: 2019-2020 and LAHSA Homeless Counts - SPA 3

	2020		2019	
	Number	Percent	Number	Percent
Total SPA 3 Homeless Count	4,555	100%	4,489	100%
Sheltered	1,528	33.5%	1,197	26.7%
Unsheltered	3,027	66.5%	3,292	73.3%
Homeless by Household Type				
Single Adults	3,615	92.7%	3,869	86.2%
Family Members	940	7.3%	616	13.7%
Unaccompanied Youth (<18 years)	0	0%	4	0.1%
Homeless Subpopulations in SPA 3				
Chronically Homeless	1,763	38.7%	1,261	28.1%
Substance Abuse	1,283	28.2%	590	13.1%
Mentally Ill	1,119	24.6%	1,053	23.5%
Veterans	187	4.1%	258	5.7%
Persons with HIV/AIDS	69	1.5%	57	1.3%
Survivors of Domestic Violence	251	5.5%	366	8.2%
Physical Disability	985	21.6%	850	18.9%
Source: 2020 & 2019 Greater Los Angeles Homeless Count www.lahsa.org/homelesscount.asp				
Note: Some people are in more than one subpopulation.				

CES Access Centers are call-in or drop-in locations where persons experiencing homelessness can gain initial access to or continue contact with housing and supportive services available through LA CES. Access Centers can provide referrals to interim housing programs, emergency services, and/or basic services like food, storage and hygiene service. From July 1 to September 30 2021, of the 2,801 individuals assessed in SPA 3, only one individual was from Bradbury
[Table 31](#). CES Access Entry Points for SPA 3 are located at Volunteers of America in Pomona and El Monte.

Table 31: Cumulative CES Statistics (July 1, 2021 – September 30,2021)

	Bradbury	SPA 3	City Share of SPA 3
CES Assessment			
Total Persons	1	2,801	0%
Individuals	1	1,596	0%
Youth	-	102	0%
Families	-	302	0%
Veterans	-	106	0%
Persons Aged 62+	-	265	0%
Types of Services Provided to Those Assisted			
Interim Housing	-	688	0%
Rapid Re-Housing	-	462	0%
Street Outreach (Contacts)	-	447	0%
Street Outreach (Engagements)	-	335	0%
Other (Non-Permanent)	-	823	0%
Placed into Permanent Housing*	-	231	0%
<p>* Includes persons that have moved into permanent housing during the reporting period (through either rapid re-housing, permanent supportive housing, or other permanent destinations).</p> <p>Note: For households with more than one person (including families), the assessment of the head of household is applied to all members.</p> <p>Source: LAHSA Homelessness Statistics by City, March 2022..</p>			

Summary of Fair Housing Issues: Disproportionate Housing Needs

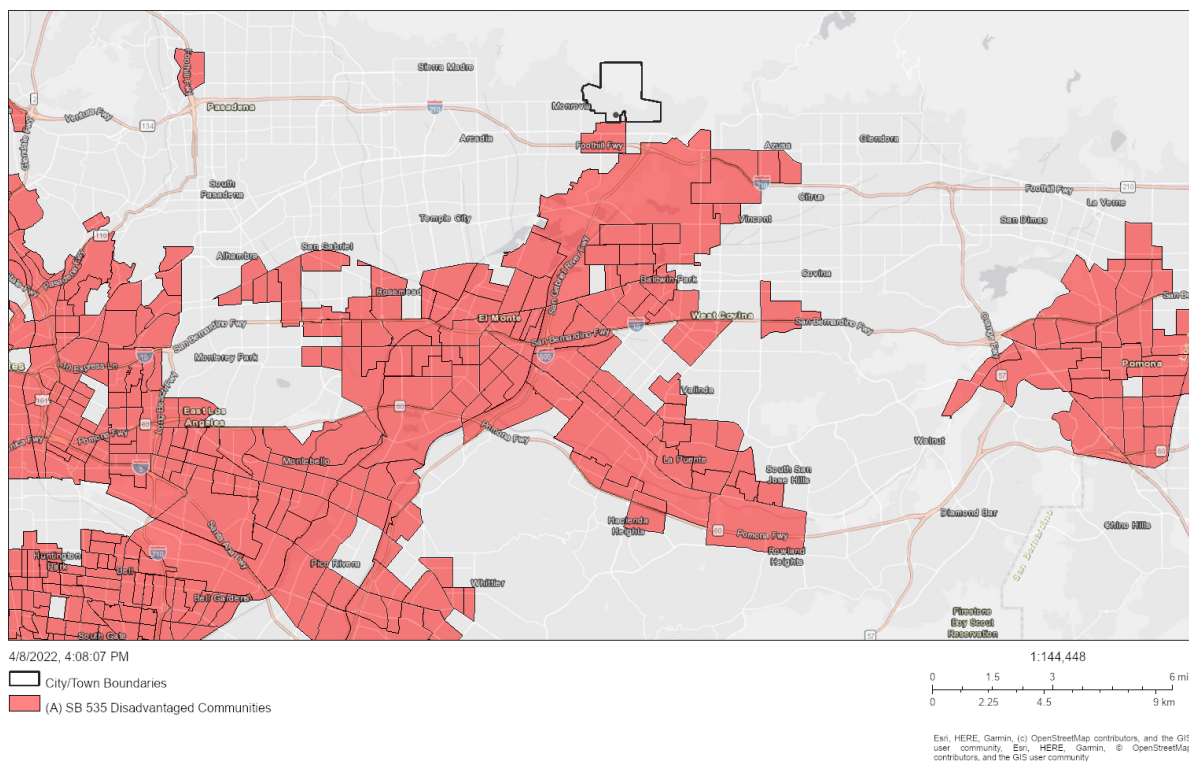
Approximately 34 owner households and 24 of renter households in Bradbury experience a housing problem. Cost burdens are the most prominent problem in the City since there are no estimated zero households experiencing overcrowding and only 1.1 percent of households with substandard conditions. Lower and moderate income households also experience cost burdens at higher rates than above moderate income households- about 60 percent of these households pay more than 30 percent of their income on housing costs. Bradbury also has a relatively newer housing stock (41 percent of stock is less than 30 years old). Bradbury is not considered a vulnerable community at risk of displacement and has an estimates homeless population of zero.

6. Other Relevant Factors

SB 535 Disadvantaged Communities

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. Known as California Climate Investments (CCI), these funds are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities at the same time they're reducing pollution that causes climate change. As identified using the HCD AFFH tool, Bradbury is not considered a disadvantaged community but the surrounding San Gabriel Valley south are "disadvantaged communities" in Baldwin Park, El Monte, and La Puente as well as east in Pomona.

Figure 42: Regional SB 355 Disadvantages Communities



Local Knowledge

Historical Trends

The City of Bradbury is named after Louis Leonard Bradbury, who in 1892 acquired 2,750 acres of the Rancho Azusa de Duarte; a Mexican land grant awarded to Andres Duarte before California became part of the United States. Louis Bradbury built Bradbury Estate on this land. After the passing of Louis Bradbury his heirs lost control of both ranches during the 1930's. Prolonged legal battles between the family members resulted in foreclosure proceedings by the Security National Bank against most of the Bradbury Estate.

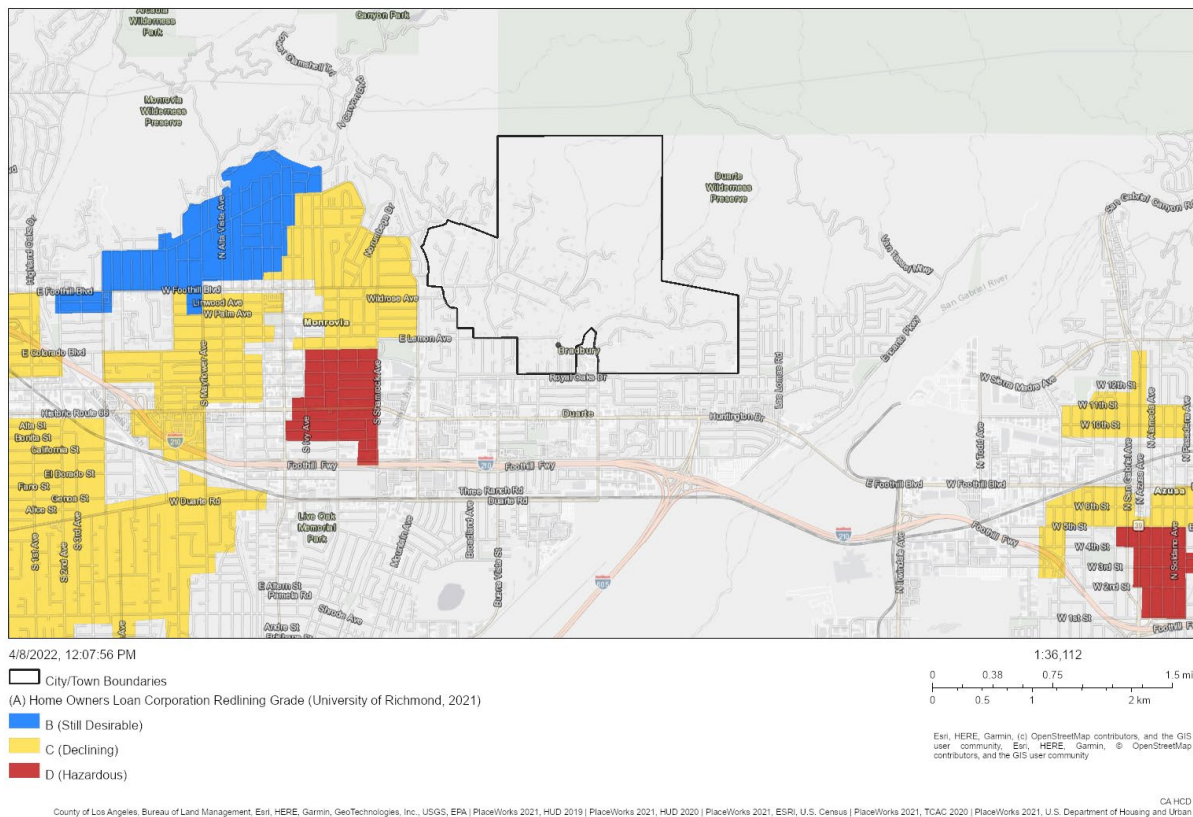
The 1896 Supreme Court ruling of Plessy v. Ferguson upheld the constitutionality of “separate but equal,” ushering in the Jim Crow Era of racial segregation and disenfranchisement. This sentiment spread beyond the South, where African Americans and other minority groups were expelled from predominantly White communities, through the adoption of policies forbidding them from residing or even being within town borders after dark, known as ‘sundown towns.’¹² Contrary to the widespread misconception that these existed only in the deep south, sundown towns were prominent throughout the Country, including more than 100 California towns, several of which in Los Angeles County.¹³

The Home Owners’ Loan Corporation (HOLC), formed in 1933 under the New Deal Program, established the County’s first red-lining maps. While the City of Bradbury did not have a grading, its neighboring City of Monrovia received a C and D ratings (Figure 43). C ratings indicated a “declining” community while D-ratings indicated the community was “hazardous” and a higher loan risk. Redlined, or D-rated communities, were typically comprised of large minority communities. Segregation achieved through redlining was further exacerbated through the establishment of the Federal Housing Administration in 1934. The FHA insured bank mortgages that covered 80% of purchase prices and had terms of 20 years and were fully amortized. However, the FHA also conducted its own appraisals; mortgages were granted only to Whites and mixed-race neighborhoods or White neighborhoods in the vicinity of Black neighborhoods were deemed “too risky.”

¹² Rothstein, Richard. (2017). The Color of Law: A Forgotten History of How Our Government Segregated America. Liveright Publishing Corporation.

¹³ History and Social Justice. (2021). <https://justice.tougaloo.edu>,

Figure 43: Home Owners Loan Corporation (HOLC) Redlining Grade



Around that time period, in Bradbury the conclusion of World War II brought new growth to what was once the Bradbury Estate and its surrounding area. Large parcels of it were sold to people seeking spacious building sites, which afforded privacy and country living in the foothills of the San Gabriel Mountains. The surrounding properties, in the then unincorporated area called Duarte, were subdivided into tracts, which provided modest and affordable living accommodations for returning service men and their families. The entire area began to change rapidly from a sleepy agricultural area to a sprawling suburb of "GI" tract homes. Local development regulations were established and enforced by the County of Los Angeles. County Departments also provided Police and Fire protection.

In 1957, while the City of Duarte was considered for incorporation, the Bradbury Estate Property Owners Association realized that if development continued at the same pace in Bradbury they would lose the ability to control their vision for the future of this area. These residents valued the unique foothills and were fearful that they would become victims to the bulldozers of tract developers. In an effort to ease their fears and to control their vision for the future the residents of the Bradbury Estates joined with property owners located within the area, surrounded by Woodlyn Lane, Bradbury Hills Road, Royal Oaks Drive North, Mount Olive Drive and Lemon Avenue, to generate the 500 minimum number of registered voters required to create a new unincorporated City. The incorporation drive was successful and upon approval of the Los Angeles County Board of Supervisors, the City of Bradbury became a municipal corporation on July 26, 1957.

Today, the city has three distinct areas—the Bradbury Estates, which is a gated community consisting of five-acre minimum estates; Woodlyn Lane, which is also a gated community with minimum two-acre (8,100) lots; and the balance of the city, which is not gated, which has lots generally ranging in size from 7,500 square feet (.17 acre) to 1-acre. A significant portion of the properties in Bradbury Estates and Woodlyn Lane are zoned for horses, and several horse ranches still exist within these communities today. Both gated communities have Homeowners Associations and Covenants, Conidations, and Restrictions (CC&R).

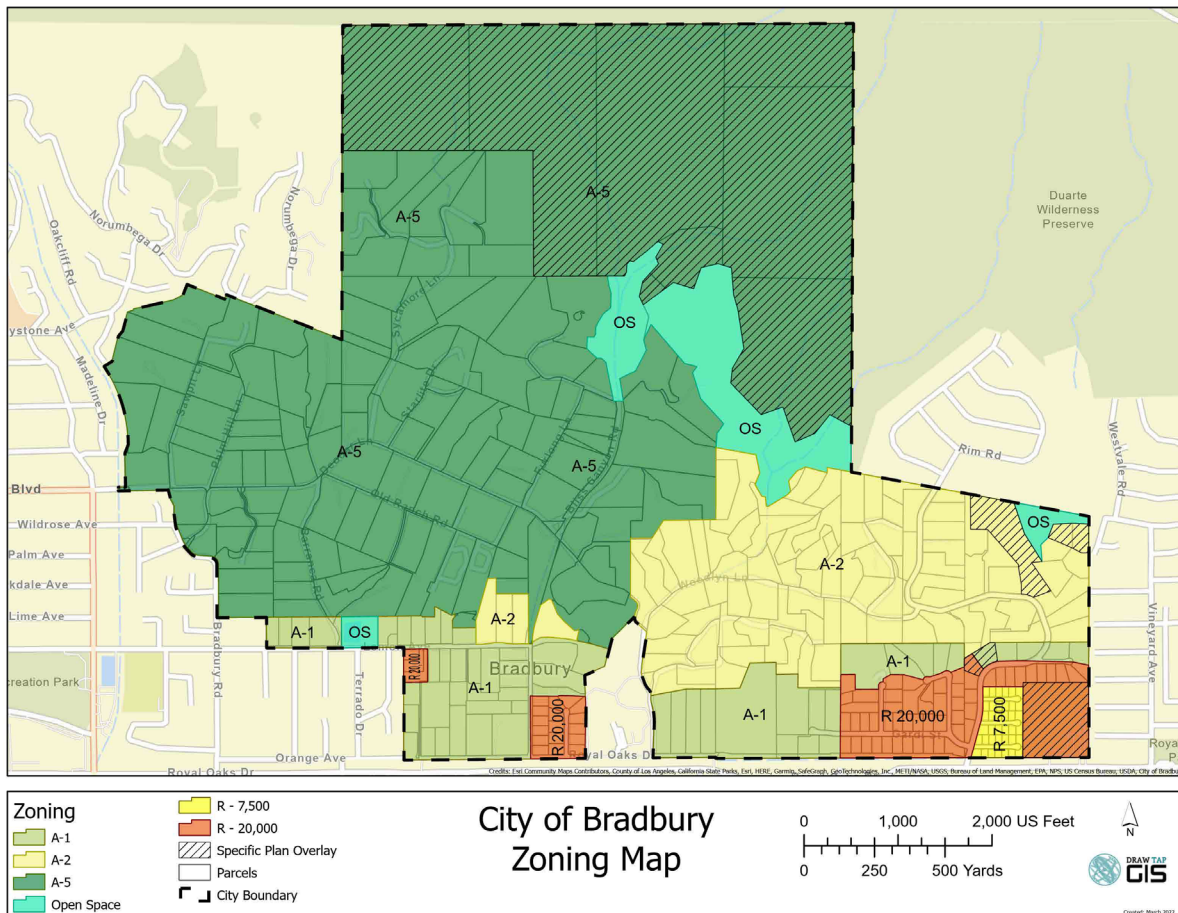
Zoning

The City’s General Plan establishes five (5) single-family residential land use categories comprising 96 percent of the developable land in the City ([Figure 44](#)). The Code establishes the regulations affecting the uses, density, and size of housing permitted in the different single-family zones of the City. As shown in [Table 32](#), the minimum size for a single-family residential lot is 7,500 sq. ft. Though Bradbury has significant land use limitations, the City is committed to providing affordable housing opportunities for lower income households, particularly through Accessory Dwelling Units (ADUs) and Single-Room Occupancy (SRO) units, which are discussed in the following sections. In addition, the presence of environmentally sensitive conditions like fire hazards and infrastructure limitations (narrow streets, private water service) present significant constraints to the development of multi-family residential development in Bradbury.

Table 32: BRADBURY ZONING DISTRICTS

Zone	Corresponding General Plan Land Use Designa
R-7,500 (Single-Family Residential, 7,500 sq. ft. minimum)	Single-Family Residential 7,500 sq. ft.
R-20,000 (Single-Family Residential, 20,000 sq. ft. minimum)	Single-Family Residential 20,000 sq. ft.
A-1 (Agriculture Residential Estate, one acre minimum)	Estate Residential, one acre
A-2 (Agriculture Residential Estate, two acre minimum)	Estate Residential, two acres
A-5 (Agriculture Residential Estate, five acre minimum)	Estate Residential, five acres
<i>Source: Bradbury Development Code, 2022.</i>	

Figure 44: Bradbury Zoning Map



In addition, in 2010, the City adopted an Affordable Housing Overlay zoning designation in which emergency shelters are a permitted use. The Overlay designation can be applied to any residentially zoned property in the City, provided that the site has adequate access and is provided with acceptable water and sewer or septic service for the intended use. The zoning on the City Hall site will be amended to include the Affordable Housing Overlay concurrent with this Housing Element. The sites inventory includes the City Hall site to accommodate multi-family housing to be built at a density of 30 du/ac. These units will provide lower and moderate income housing opportunities.

Local Setting

Bradbury is developed exclusively with single-family detached residential units. The City is a hillside community comprised primarily of large estate lots, orchards, and equestrian facilities. Bradbury is one of the smallest cities in Los Angeles County, encompassing only 1.9 square miles. In the 1870s, Bradbury was developed and subdivided into 40+ acre parcels with the intention to use the parcels mainly for ranching.

There are eight large parcels of land comprising approximately 302 acres in the northern portion of the City. According to Bradbury's General Plan, the City recognizes that the eight parcels of land, as they exist currently, have the opportunity to be developed with one main dwelling unit

and one accessory dwelling unit per parcel. The northern section of the City is located adjacent to the City of Monrovia /Angeles National Forest that appear to have average slopes that range from 24% to 57%. Limited access to the eight parcels mentioned previously, lack of urban utilities, and the potential existence of sensitive ecological areas and species may render these parcels very difficult or potentially economically infeasible for residential estate development. It should be noted that residential development of this area is not limited to the 16 units; development density may be increased through the utilization of land division and development concepts, such as clustered development, that can be developed through a specific plan.

As of 2022, the City has completed the Chadwick Ranch Estates Specific Plan and is in the process of completing an Environmental Impact Report (EIR). The Chadwick Ranch Estates Specific Plan project includes requests for several discretionary permits that would allow grading of 14 lots for single-family estate residences; construction of related roadways and utilities; and designation of 15 lettered nonresidential lots consisting of open space, debris basins and a water quality basin, a reservoir, a private street and an emergency access.

There are three distinct neighborhoods in the City, known as Bradbury Estates, the Woodlyn Lane Improvement Association, and the Bradbury Hills Road and Lane Association. The remaining residential areas are traditional single-family detached residential neighborhoods. Bradbury Estates is a gated community consisting of large residential parcels ranging in size from two to 70 acres in size. Woodlyn Lane and Bradbury Hills Road are also gated communities with parcels two acres or larger. The gated communities in Bradbury have privately owned and maintained streets.

Due to the overall nature of Bradbury, development opportunities may be limited. However, the City has identified several sites with the potential for residential development. An analysis of these sites as they relate to AFFH is described in Section 7, *Sites Inventory and AFFH*, below.

7. *Sites Inventory and AFFH*

Given that Bradbury is only made up of one census tracts, determining whether there are geographical areas of concentration which the sites inventory would exacerbate or improve is difficult. In addition, the City is considered an area of highest resources and does not have any significant special needs populations other than seniors (which make up the majority of its population with disabilities) and 25 percent LMI households. However, the City is considered one of the most expensive places to live- it ranked number one on Forbes' annual ranking of America's Most Expensive ZIP Codes in 2010.¹⁴ According to SCAG's Pre-Certified Local Housing Data, Bradbury's median home price in 2018 was \$1.3 million, more than twice the median for the SCAG region's median of \$560,997. The high housing costs are reflected in that about one third of the City's households are cost burdened, and in a trend that deviates from the County and many other jurisdictions, the share of cost burdened homeowners is larger than the share of cost burdened renters.

¹⁴ <https://www.forbes.com/2010/09/27/most-expensive-zip-codes-2010-lifestyle-real-estate-zip-codes-10-intro.html?sh=400da2932564>

As explained in Chapter IV, the City of Bradbury has adequate land capacity to meet the needs of all income groups through the 2021-2029 RHNA period. There is a capacity of 69 units in the City's sites inventory distributed between vacant underdeveloped parcels, the Affordable Housing Overlay, and estimated 2nd DUs / ADUs / JADUs on developed parcels on developed parcels. However, for the purposes of analyzing the distribution of sites, the City focuses on the 45 units distributed between the Vacant Underdeveloped parcels and the Affordable Housing Overlay since the location of ADUs on developed parcels is unknown. In addition, the AFFH geographical analysis does not include SROs in vacant undeveloped parcels because the location and affordability of SROs at each location is unknown. The City assumed that 16 SROs were distributed between 17 parcels of vacant undeveloped land. Half of these 17 parcels were assumed to include at least a two-unit SRO development, yielding 16 SRO units based on current development trends.¹⁵

Table 33: Development Potential Summary

	<u>Extremely Low/ Very Low</u>	<u>Low</u>	<u>Moderate</u>	<u>Above Moderate</u>	<u>Total</u>
<u>Vacant Undeveloped Parcels</u>	<u>---</u>		<u>---</u>	<u>27</u>	<u>27</u>
<u>SRO Development</u>	<u>11</u>		<u>0</u>	<u>5</u>	<u>16</u>
<u>2nd DUs / ADUs / JADUs on Developed Parcels</u>	<u>5</u>		<u>1</u>	<u>2</u>	<u>8</u>
<u>Affordable Housing Overlay</u>	<u>10</u>		<u>8</u>	<u>--</u>	<u>18</u>
<u>Total Sites Inventory</u>	<u>26</u>		<u>9</u>	<u>34</u>	<u>69</u>
<u>Total Sites in AFFH Analysis</u>	<u>10</u>		<u>8</u>	<u>27</u>	<u>45</u>

For the purposes of this AFFH sites analysis, Bradbury is broken up into three neighborhoods defined by zoning code designations. As discussed previously, the entirety of Bradbury is located within one tract; therefore, AFFH variables discussed throughout this Appendix will be consistent throughout all three neighborhoods. A total of 45 RHNA units have been allocated throughout the City in various neighborhoods. The neighborhood distributions are detailed below.

Northern Bradbury. This neighborhood encompasses most of the City and is characterized by A-5 and OS zoning designations (see Figure 44). This includes most of the area north of Lemon Avenue and Woodlyn Lane. The following sites are located in Northern Bradbury:

¹⁵ Because of the uneven number of lots, "half" of them is either of either eight or nine lots, resulting in a potential SRO capacity of 16 or 18 units respectively. The lower estimate of 16 units is used in the sites methodology.

Table 34: RHNA Site Distribution- Northern Bradbury

<u>Site ID</u>	<u>APN</u>	<u>Site Type/Land Use</u>	<u>Extremely Low/Very Low</u>	<u>Low</u>	<u>Moderate</u>	<u>Above Moderate</u>	<u>Total</u>
<u>1</u>	<u>8527-002-023</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>2</u>	<u>8527-004-020</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>8</u>	<u>8527-024-032</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>9A</u>	<u>8527-025-034</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>10</u>	<u>8527-026-006</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>11</u>	<u>8527-029-001</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>12</u>	<u>8527-029-017</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>16</u>	<u>8527-002-029</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>17</u>	<u>8527-002-030</u>	<u>Vacant Site, A-5</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
	<u>Total Northern Bradbury</u>		<u>0</u>		<u>0</u>	<u>9</u>	<u>9</u>
Note: The city estimated that 16 SROs would be distributed between 17 vacant non-developed sites (11 lower income and 5 above moderate income). Since the City cannot know which sites will have SROs and their income levels, this table does not show any of these SRO units. The sites still have the potential to accommodate some of these SROs.							

There are nine RHNA units allocated in this section of this City, representing 13 percent of all units identified to satisfy Bradbury's RHNA. As noted in the table, there is also a potential for more lower and above moderate income units in the form of SROs but these units are not included in the analysis since their distribution across the 17 vacant parcels is unknown. As discussed above, Bradbury is a TCAC highest resource area. The City's RHNA strategy encourages new units suitable for lower income households throughout the City, including in Northern Bradbury in the form of SROs. The City's RHNA strategy in this section of the City does not exacerbate fair housing conditions and promotes mixed income communities and new housing opportunities in high resource areas.

Southeastern Bradbury. This analysis categorizes Southeastern Bradbury by the A-2, A-1, R-7,500, and R-20,000 zoning designations in the southeast corner of the City. There is also a small area zoned OS in this neighborhood. Southeastern Bradbury contains the only area zoned for R-7,500 in the City. Only sites designated A-1 and A-2 sites have been identified in Southeastern Bradbury.

Table 35: RHNA Site Distribution- Southeastern Bradbury

<u>Site ID</u>	<u>APN</u>	<u>Site Type/Land Use</u>	<u>Extremely Low/Very Low</u>	<u>Low</u>	<u>Moderate</u>	<u>Above Moderate</u>	<u>Total</u>
<u>4</u>	<u>8527-016-019</u>	<u>Vacant Site, A-2</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>5</u>	<u>8527-016-046</u>	<u>Vacant Site, A-2</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>6</u>	<u>8527-016-037</u>	<u>Vacant Site, A-2</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>7</u>	<u>8527-021-011</u>	<u>Vacant Site, A-2</u>	<u>--</u>		<u>--</u>	<u>1</u>	<u>1</u>
<u>18</u>	<u>8527-021-041</u>	<u>Vacant Site, A-1</u>	<u>--</u>		<u>--</u>	<u>6</u>	<u>6</u>

<u>3</u>	<u>8527-016-049</u>	<u>Vacant Site, A-2/ SP Overlay</u>	<u>--</u>	<u>--</u>	<u>3</u>	<u>3</u>
	<u>Total Southeastern Bradbury</u>		<u>0</u>	<u>0</u>	<u>13</u>	<u>13</u>
Note: The city estimated that 16 SROs would be distributed between 17 vacant non-developed sites (11 lower income and 5 above moderate income). Since the City cannot know which sites will have SROs and their income levels, this table does not show any of these SRO units. The sites still have the potential to accommodate some of these SROs.						

A total of 13 RHNA units have been identified in Southeastern Bradbury, representing 19 percent of units identified Citywide. Again, the potential lower income SRO units are not identified in this breakdown because the exact sites where they will be located is unknown. Like Northern Bradbury, the City's RHNA strategy in Southeastern Bradbury ensures RHNA units of a single income level are not concentrated in this section of the City through SROs, which are assumed to be suitable for lower and above moderate income households. The RHNA strategy in Southeastern Bradbury promotes mixed income communities and new housing opportunities in high resource areas, including housing opportunities for lower income households. The City's RHNA strategy in this section of the City does not exacerbate existing fair housing conditions.

Southern Bradbury. Southern Bradbury is the smallest neighborhood defined in this analysis, represented by A-1, A-2, R-20,000, and a small area of OS designations. Most of Southern Bradbury is south of Lemon Avenue, but also includes the A-1, OS, and A-2 zoned areas just north of Lemon Avenue. The following RHNA sites are located in Southern Bradbury:

Table 36: RHNA Site Distribution- Southern Bradbury

<u>Site ID</u>	<u>APN</u>	<u>Site Type/Land Use</u>	<u>Extremely Low/ Very Low</u>	<u>Low</u>	<u>Moderate</u>	<u>Above Moderate</u>	<u>Total</u>
<u>AHO</u>	<u>8527-022-901</u>	<u>AH Overlay, A-1</u>	<u>10</u>		<u>8</u>	<u>--</u>	<u>18</u>
<u>13</u>	<u>8527-023-012</u>	<u>Vacant Site, A-1</u>	<u>--</u>		<u>--</u>	<u>2</u>	<u>3</u>
<u>15</u>	<u>8527-023-021</u>	<u>Vacant Site, A-1</u>	<u>--</u>		<u>--</u>	<u>3</u>	<u>4</u>
	<u>Total Southern Bradbury</u>		<u>10</u>		<u>8</u>	<u>5</u>	<u>23</u>
Note: The city estimated that 16 SROs would be distributed between 17 vacant non-developed sites (11 lower income and 5 above moderate income). Since the City cannot know which sites will have SROs and their income levels, this table does not show any of these SRO units. Sites 13 and 15 still have the potential to accommodate some of these SROs.							

The City's RHNA strategy allocates 23 units over four sites in Southern Bradbury, including 10 lower income units, eight (8) moderate income units, and five (5) above moderate income units. The 23 units in this neighborhood represents 33 percent of the 69 units identified citywide to meet the RHNA. Like the neighborhoods discussed above, the City's RHNA strategy in Southern

Bradbury includes a mix of unit types suitable for all income levels. Sites 13 and 15 have the potential for SROs (not shown in table) which would be suitable for lower income households. About 38 percent of the City's lower income RHNA is located in Southern Bradbury mostly due to the AHO with a capacity of 10 lower income units. However, the remainder 16 lower income units are distributed across other neighborhoods of the City in the form of SROs and ADUs. Also, of all Bradbury neighborhoods, southern Bradbury is closer and better connected services and amenities both within the City and nearby cities. Like the strategy in the remainder of the City, RHNA units in Southern Bradbury promote mixed income communities and housing units in high resource areas.

The City's RHNA strategy allocates units of all income types in all areas of Bradbury. RHNA sites identified do not exacerbate conditions related to fair housing.

Table 37: Distribution of RHNA Sites by Neighborhood

	<u>Extremely Low/ Very Low</u>	<u>Low</u>	<u>Moderate</u>	<u>Above Moderate</u>	<u>Total</u>
<u>Northern Bradbury</u>	<u>0</u>		<u>0</u>	<u>9</u>	<u>9</u>
<u>Southeastern Bradbury</u>	<u>0</u>		<u>0</u>	<u>13</u>	<u>13</u>
<u>Southern Bradbury</u>	<u>10</u>		<u>8</u>	<u>5</u>	<u>23</u>
<u>Total Sites in AFFH Analysis</u>	<u>10</u>		<u>8</u>	<u>27</u>	<u>45</u>

Table 38 summarizes the characteristics of Bradbury's census tract in relation to its sites inventory for the 45 units distributed across Bradbury.

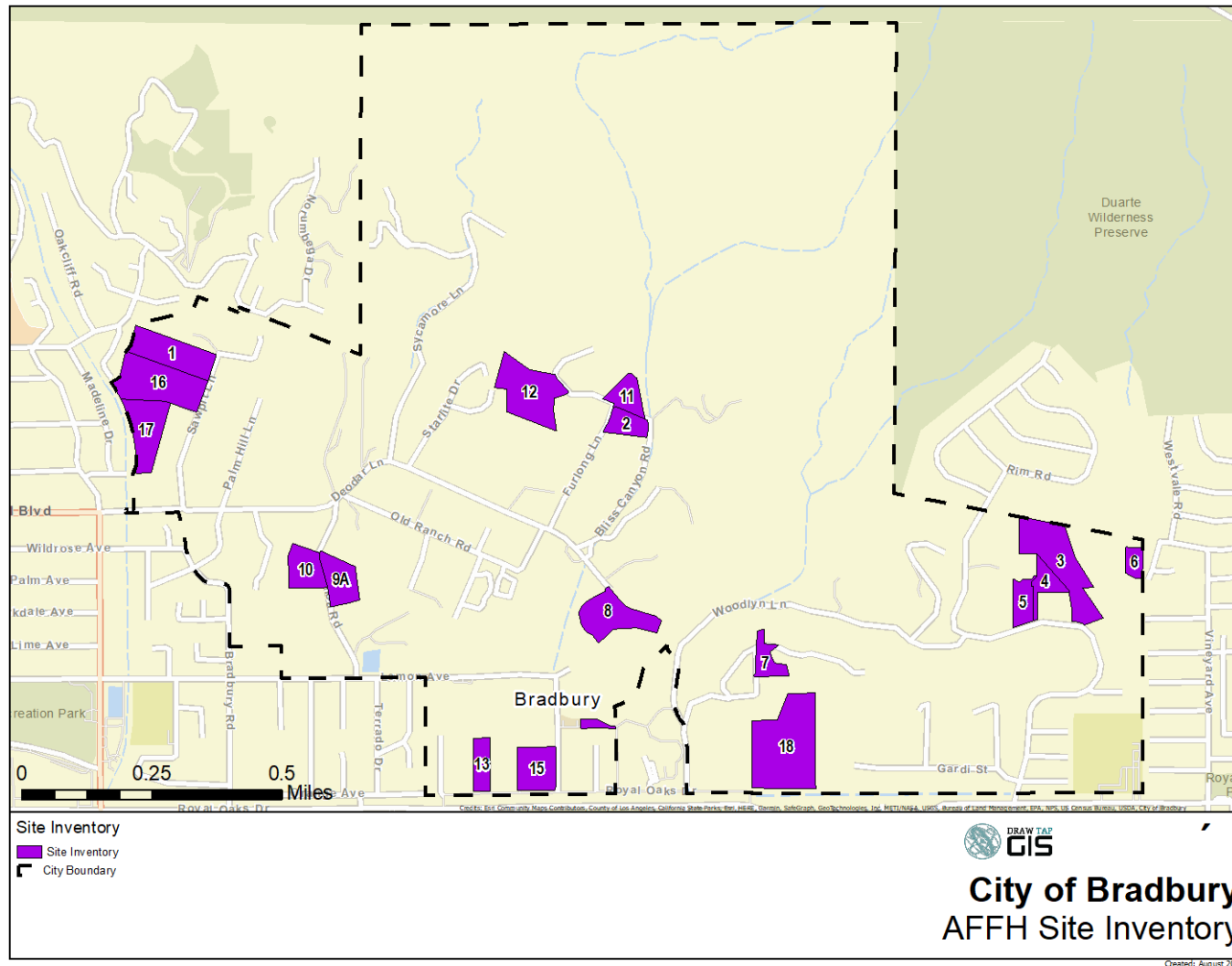
Table 38: Bradbury Sites Inventory AFFH Analysis

Segregation and Integration								
Tract	Total Capacity (Net Units)	Income Distribution of Potential Units			% of Minorities in Census Tract (non-White residents)	% Population with a Disability	% Single Female-Headed Households with Children	% of Census Tract LMI Households
		Lower Income	Moderate Income	Above Moderate Income				
Census Tract 4302.00	<u>45</u>	<u>10</u>	<u>8</u>	<u>27</u>	54.9%	8.3%	6.3%	24.4%

Access to Opportunity									
Tract		Income Distribution of Potential Units			Economic Domain Score	Environmen tal Domain Score	Education Domain Score	Composite Index Score	Opportunity Category
	Total Capacity (Net Units)	Lower Income	Moderate Income	Above Moderate Income					
Census Tract 4302.00	45	10	8	27	0.89	0.88	0.60	0.44	Highest Resource

Disproportionate Housing Need									
Tract		Income Distribution of Potential Units			% Cost Burdened Owner Households	% Cost Burdened Renter Households	% Overcrowded Households	% Households with Substandard Conditions	Homeless Population
	Total Capacity (Net Units)	Lower Income	Moderate Income	Above Moderate Income					
Census Tract 4302.00	45	10	8	27	33.3%	16.9%	0%	1.1%	0

Figure 45: Sites Inventory



8. Identification and Prioritization of Contributing Factors

Overall, the City is made up of an affluent mostly White and Asian aging community (over 50 percent are over the age of 45). Due to its small size- only once census tract- there is no geographic concentration of poverty or ethnic groups. Bradbury is considered an area of “highest” opportunity and does not have overcrowding or substandard condition housing problems. The most prominent fair housing problems in the City are related to fair housing outreach and enforcement and housing for special needs groups.

Fair Housing Enforcement and Outreach

The City did not have any fair housing complains or housing choice voucher users according to the most recent data posted in HCD’s AFFH Data Viewer. There are also no records of fair housing testing during the 6th Cycle planning period. The City does appear to be lacking in its outreach efforts- both in disseminating fair housing services and in engaging the public during the Housing Element Process.

Contributing Factors:

- Lack of monitoring
- Lack of outreach towards special needs groups
- Lack of marketing of community meetings and fair housing services

Priority:

The City will prioritize addressing the lack of marketing of services since education this is the most important factor in being able to inform residents of their fair housing rights, and empower them to make complaints when necessary as well as to inform landlords of their responsibilities to ensure fair housing. By July 2023, update City website to provide links to various local, state, and federal agencies and organizations that provide housing and related services and programs (Fair Housing Outreach and Education Program). The City will also annually publish housing resources on City newsletter.

Housing Needs for Special Needs Groups

Bradbury’s population with a disability is mostly made up of seniors - with the most common disability being ambulatory difficulties. This indicates a higher need for housing for seniors with disabilities. In addition, about one quarter of the City’s households earn low-to-moderate income households and LMI households experience cost burdens at the higher rates than above moderate households. About 60 percent of LMI households are cost-burdened. These groups require special housing needs- assisted living or reasonable accommodations_ for seniors with disabilities and affordable housing for low and moderate income households.

Contributing Factors

- Location and type of affordable housing
- Lack of knowledge of fair housing rights and resources
- Land use and zoning laws

Priority:

The City will prioritize advertising the rights and services available to special needs groups as part of its Reasonable Accommodation Program and its Housing for Persons with Disabilities Program.

By [July 2023](#), update City website to publicize information on reasonable accommodations. This and to inform Bradbury families of the housing opportunities and services available for persons with developmental disabilities. These resource help facilitate housing mobility or allow persons with disabilities to age in place.

The City will also prioritize the constraints from its land use and zoning laws by amending its zoning code to promote a variety of housing types. As part of its Multi-Family Housing Program, Zoning Code Provisions for Special Needs Households Program, and Accessory Dwelling Unit (ADU)/Junior ADU Program, the City will:

- Amend the Affordable Housing Overlay Zone to include affordable multi-family housing (at a density between 20 and 30 units per acre) as an allowable use and to establish appropriate development standards for multi-family housing.
- Amend the Development Code to require cooking facilities to be included in individual SRO units to ensure each unit is a separate and adequate dwelling unit. Increase the allowable number of SRO units in SRO developments in A-1 zone from three to four units, and in A-2 zone from five to six units. To accommodate the requirement for cooking facilities, the maximum unit size for SRO units will be increased from 250 square feet to 300 square feet. This will create housing opportunities for lower income residents.
- Review the conditions for approval for conditional use permits in most residential zone for residential care facilities of seven or more persons to ensure they are objective and provide certainty and consistency in outcomes.
- Develop incentives to facilitate the development of these various types of ADUs-including creating an ADU handout to be posted online as well as creating pre-approved plans.

EXHIBIT B

Housing Element Completeness Checklist A Quick Reference of Statutory Requirements for Housing Element Updates



HOUSING ELEMENT COMPLETENESS CHECKLIST

A Quick Reference of Statutory Requirements for Housing Element Updates Updated 1/2021

The purpose of this completeness checklist is to assist local governments in the preparation of their housing element. It includes the statutory requirements of Government Code section 65580 – 65588. Completion of this checklist is not an indication of statutory compliance but is intended to provide a check to ensure that relevant requirements are included in the housing element prior to submittal to the Department of Housing and Community Development pursuant to Government Code section 65585(b). For purposes of the Checklist the term “analysis” is defined as a description and evaluation of specific needs, characteristics, and resources available to address identified needs.

For technical assistance on each section visit [California Housing and Community Development Building Blocks Technical Assistance](https://www.hcd.ca.gov/community-development/building-blocks/index.shtml) (<https://www.hcd.ca.gov/community-development/building-blocks/index.shtml>)

Checklist

Public Participation

Government Code section 65583, subdivision (c)(8)

Description of Requirement	Page Number
Description of the diligent efforts the jurisdiction made to include all economic segments of the community and/or their representatives in the development and update of the housing element	App A
Summary of the public input received and a description of how it will be considered and incorporated into the housing element.	A-1

Review and Revise

Government Code section 65588, subdivision (a)

Description of Requirement	Page Number
<u>Progress in implementation</u> – A description of the actual results or outcomes of the previous element's goals, objectives, policies, and programs (e.g. what happened).	Ch 5
<u>Effectiveness of the element</u> – For each program, include an analysis comparing the differences between what was projected or planned in the element and what was achieved.	Ch 5
<u>Appropriateness of goals, objectives, policies, and programs</u> –A description of how the goals, objectives, policies, and programs in the updated element are being changed or adjusted to incorporate what has been learned from the results of the previous element. (e.g. continued, modified, or deleted.)	Ch 5
<u>Special needs populations</u> – Provide a description of how past programs were effective in addressing the housing needs of the special populations. This analysis can be done as part of describing the effectiveness of the program pursuant to (2) if the jurisdiction has multiple programs to specifically address housing needs of special needs populations or if specific programs were not included, provide a summary of the cumulative results of the programs in addressing the housing need terms of units or services by special need group.	V-7 to V-9
<u>AB 1233 – Shortfall of sites from the 5th cycle planning period</u> – Failure to implement rezoning required due to a shortfall of adequate sites to accommodate the 5th cycle planning period RHNA for lower-income households triggers the provisions of Government Code section 65584.09.	N/A

Comments:

Housing Needs Assessment – Quantification and Analysis of Need
Government Code section 65583, subdivision (a)(1)(2) and section 65583.1, subdivision (d)

For information on how to credit reductions to RHNA See “Housing Element Sites Inventory Guidebook” at [HCD’s technical assistance memos](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml) (https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml)

Description of Requirement	Page Number
Population (e.g., by age, size, ethnicity, households by tenure) and employment trends	II-1 to 5
Household characteristics including trends, tenure, overcrowdings and severe overcrowding	II-5, III-2
Overpayment by income and tenure	III-3
Existing housing need for extremely low-income households	III-9
Projected housing needs: Regional Housing Needs Allocation (RHNA) by income group, including projected extremely low-income households	III-2
Housing stock conditions, including housing type, housing costs, vacancy rate	II-6 to 11
Estimate of the number of units in need of replacement and rehabilitation	II-7

Identification and Analysis of the Housing Needs for Special Needs Populations

Government Code section 65583, subdivision (a)(7)

Description of Requirement	Page Number
Elderly	III-6
Persons with Disabilities, including Developmental Disabilities	III-4 to 6
Large Households	III-7
Farmworkers (seasonal and permanent)	III-7
Female Headed Households	III-7
Homeless (seasonal and annual based on the point in time count)	III-7
Optional: Other (e.g. students, military)	

Comments:

**Affirmatively Further Fair Housing - An Assessment of Fair Housing –
Required for Housing Element due after 1/1/2021.
Government Code section 65583, subdivision (c)(10)(A)**

Part 1 Outreach

Description of Requirement	Page Number
Does the element describe and incorporate meaningful engagement that represents all segments of the community into the development of the housing element, including goals and actions?	App A

Part 2 Assessment of Fair Housing

Description of Requirement	Page Number
Does the element include a summary of fair housing enforcement and capacity in the jurisdiction?	B-4 to 8
The element must include an analysis of these four areas: Integration and segregation patterns and trends	B-9 to 28
Racially or ethnically concentrated areas of poverty	B-29 to 36
Disparities in access to opportunity	B-37 to 59
Disproportionate housing needs within the jurisdiction, including displacement risk	B-60 to 78

Each analysis should include these components:

- ☐ Local: Review and analysis of data at a local level
- ☐ Regional impact; Analysis of local data as it compares on a regional level
- ☐ Trends and patterns: Review of data to identify trends and patterns over time
- ☐ Other relevant factors, including other local data and knowledge
- ☐ Conclusion and findings with a summary of fair housing issues

Part 3 Sites Inventory

Description of Requirement	Page Number
Did the element identify and evaluate (e.g., maps) the number of units, location and assumed affordability of identified sites throughout the community (i.e., lower, moderate, and above moderate income RHNA) relative to all components of the assessment of fair housing?	B-83 to 88
Did the element analyze and conclude whether the identified sites improve or exacerbate conditions for each of the fair housing areas (integration and segregation, racially and ethnically concentrated areas of poverty, areas of opportunity, disproportionate housing needs including displacement)?	B-83 to 88

Comments:

Part 4 Identification of Contributing Factors

Description of Requirement	Page Number
Did the element identify, evaluate, and prioritize the contributing factors to fair housing issues?	B83to88

Part 5 Goals and Actions Page

Description of Requirement	Page Number
Did the element identify, goals and actions based on the identified and prioritized contributing factors?	B-90to91
Do goals and actions address mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for preservation and revitalization, displacement protection and other program areas?	Ch6

Programs must include the following components:

- ☒ Actions must be significant, meaningful and sufficient to overcome identified patterns of segregation and affirmatively further fair housing.
- ☒ Metrics and milestones for evaluating progress on programs/actions and fair housing results.

Affordable Housing Units At-Risk of Conversion to Market Rate **Government Code section 65583, subdivision (a)(9)**

See [Preserving Existing Affordable Housing](https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml) (https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml)

Description of Requirement	Page Number
Provide an inventory of units at-risk of conversion from affordable to market-rate rents within 10 years of the beginning of the planning period. The inventory must list each development by project name and address, the type of governmental assistance received, the earliest possible date of change from low-income use, and the total number of elderly and nonelderly units that could be lost from the locality's low-income housing stock in each year.	III-8
Provide an estimate and comparison of replacement costs vs. preservation costs	N/A
Identify qualified entities to acquire and manage affordable housing	N/A
Identify potential funding sources to preserve affordable housing	N/A

Comments: For at-risk conversion section, there are zero units at risk or households receiving assistance so HE does not identify entities to manage AH or funding sources to preserve it.

Analysis of Actual and Potential Governmental Constraints

Government Code section, 65583, subdivisions (a)(5), (a)(4), (c)(1), and section 65583.2, subdivision (c)

See "Accessory Dwelling Unit Handbook" at [HCD's Accessory Dwelling Unit Assistance page](https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml) (<https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml>)

Description of Requirement	Page Number
Land use controls (e.g. parking, lot coverage, heights, unit size requirements, open space requirements, Accessory Dwelling Unit (ADU) requirements, floor area ratios, growth controls (e.g., caps on units or population or voter approval requirements, conformance with the requirements of SB 330), inclusionary requirements, consistency with State Density Bonus Law and Housing Accountability Act, and consistency with zoning and development standard website publication and transparency requirements pursuant to Gov. Code § 65940.1 subd. (a)(1)(B)).	IV-2-IV15
Local processing and permit procedures (e.g., typical processing times, permit types/requirements by housing type and zone, decision making criteria/findings, design/site/architectural review process and findings, description of standards [objective/subjective], planned development process). Element should also describe whether the jurisdiction has a process to accommodate SB 35 streamline applications and by-right applications for permanent supportive housing and navigation centers.	IV-21
Building codes and their enforcement (e.g., current application of the California Building Code, any local amendments, and local code enforcement process and programs)	IV-17
On and Off-Site improvement requirements (e.g., street widths, curbing requirements)	IV-18
Fees and other exactions (e.g., list all fees regardless of entity collecting the fee, analyze all planning and impact fees for both single family and multifamily development, provided typical totals and proration to total development costs per square foot, and consistency with fee website publication and transparency requirements pursuant to Gov. Code § 65940.1 subd. (a)(1)(A)).	IV-19
Housing for persons with disabilities (e.g. definition of family, concentrating/siting requirements for group homes, reasonable accommodation procedures, application of building codes and ADA requirements, zoning for group homes and community care facilities)	IV-16
Analysis of locally-adopted ordinances that directly impact the cost and supply of housing (e.g. inclusionary ordinance, short-term rental ordinance)	IV-23

Comments:

An Analysis of Potential and Actual Nongovernmental Constraints
Government Code section, 65583, subdivision (a)(6)

Description of Requirement	Page Number
Availability of financing	IV-25
Price of land	IV-24
Cost of Construction	IV-24
Requests to develop housing below identified densities in the sites inventory and analysis	IV-25
Typical timeframes between approval for a housing development project and application for building permits	IV-25

- ☒ Does the analysis demonstrate the jurisdiction's action(s) to mitigate nongovernmental constraints that create a gap between planning for housing to accommodate all income levels and the construction of housing to accommodate all income levels?

Zoning for a Variety of Housing Types

Government Code section, 65583, subdivisions (a)(4), (c)(1), and subdivision 65583.2 subdivision (c)

Provide an analysis of zoning and availability of sites for a variety of housing types including the following:

Description of Requirement	Page Number
Multifamily Rental Housing	IV-5
Housing for Agricultural Employees (permanent and seasonal) (compliance with Health and Safety Code sections 17021.5, 17021.6, and 17021.8	IV-10
Emergency Shelters (including compliance with new development/parking standards pursuant to AB 139/Gov. Code § 65583 subd. (a)(4)(A)).	IV-11
Low Barrier Navigation Centers	IV-14
Transitional Housing	IV-15
Supportive Housing (including compliance with AB 2162, statutes of 2019)	IV-15
Single-Room Occupancy Units	IV-7
Manufactured homes, including compliance with Gov. Code § 65852.3	IV-4
Mobile Home Parks	IV-4
Accessory Dwelling Units	IV-5

Comments: AB 2339 analysis done IV-12

Site Inventory and Analysis

Government Code, section 65583, subdivision (a)(3), section 65583.1, subdivision

See “Housing Element Sites Inventory Guidebook” and “Default Density Standard Option” at [HCD’s technical assistance memos](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml) (https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml)

See [Site Inventory Form](https://www.hcd.ca.gov/community-development/housing-element/docs/Site_inventory_template09022020.xlsm) (https://www.hcd.ca.gov/community-development/housing-element/docs/Site_inventory_template09022020.xlsm) and [Site Inventory Form Instructions](https://www.hcd.ca.gov/community-development/housing-element/docs/Site_inventory_instructions.pdf) (https://www.hcd.ca.gov/community-development/housing-element/docs/Site_inventory_instructions.pdf)

Site Inventory – The site inventory must be prepared using the form adopted by HCD.

A electronic copy of the site inventory is due at the time the adopted housing element is submitted to HCD for review and can be sent to siteinventory@hcd.ca.gov.

Site Inventory

Description of Requirement	Page Number
<i>Sites Inventory Form Listing:</i> Parcel listing by parcel number, size, general plan and zoning, existing uses on non-vacant sites, realistic capacity, level of affordability by income group, publicly owned sites (optional).	IP
<i>Prior Identified Sites:</i> Address whether sites are adequate to accommodate lower income needs based on identification in the prior planning period for non-vacant sites or two or more for vacant sites.	IV-35
Map of sites	IV-35

☐ Did the jurisdiction use the sites inventory form adopted by HCD?

Site Inventory Analysis and Methodology

Description of Requirement	Page Number
<i>RHNA Progress:</i> List the number of pending, approved or permitted units by income group based on actual or anticipated sales prices and rents since the beginning of the projection period	N/A
<i>Environmental Constraints:</i> Address any known environmental or other constraints, conditions or circumstances, including mitigation measures, that impede development in the planning period	IV-34
<i>Appropriate density:</i> Identification of zoning to accommodate RHNA for lower-income households: <ul style="list-style-type: none">• Identify zones meeting the “default” density (Gov. Code § 65583.2 subd. (c)(3)(B)) or;• Identify and analyze zones with densities less than the “deemed appropriate” (default) density that are appropriate to accommodate lower RHNA.	IV-33AHO

Comments:

Description of Requirement	Page Number
<p><i>Capacity:</i> Describe the methodology used in quantifying the number of units that can be accommodated on each APN:</p> <ul style="list-style-type: none"> • If development is required to meet a minimum density, identify the minimum density, or; • Describe the methodology used to determine realistic capacity accounting for land use controls and site improvement requirements, typical density trends for projects of similar affordability, and current or planned infrastructure. • For sites with zones allowing non-residential uses, demonstrate the likelihood of residential development 	IV-30
<p><i>Infrastructure:</i> Existing or planned infrastructure to accommodate the regional housing need, including water, sewer and dry utilities</p>	IV-27
<p><i>Small and large sites:</i> Sites identified to accommodate lower RHNA that are less than one-half acre or larger than 10 acres require analysis to establish they are adequate to accommodate the development of affordable units.</p>	N/A
<p><i>Affirmatively Furthering Fair Housing:</i> Identified sites throughout the community that affirmatively furthers fair housing (see page 5 of checklist)</p>	APP B
<p><i>Nonvacant Sites Analysis:</i> For nonvacant sites, demonstrate the potential and likelihood of additional development within the planning period based on extent to which existing uses may constitute an impediment to additional residential development, past experience with converting existing uses to higher density residential development, current market demand for the existing use, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites</p>	IV-33
<p>If nonvacant sites accommodate 50 percent or more of the lower-income RHNA, demonstrate the existing use is not an impediment to additional development and will likely discontinue in the planning period, including adopted findings based on substantial evidence.</p>	N/A
<p>Nonvacant sites that include residential units (either existing or demolished) that are/were occupied by, or subject to, affordability agreements for lower-income households within 5 years are subject to a housing replacement program. (Gov. Code § 65583.2 subd. (g)(3))</p>	N/A

Please note: This checklist does not include new requirements related to zoning for sites accommodating the moderate and above moderate income pursuant to AB 725, statutes of 2020 as this requirement is not enacted until 2022.

Comments:

Alternative Methods to Accommodate the RHNA: Optional

Description of Requirement	Page Number
Accessory Dwelling Units: Analyze the number and affordability level of ADU units projected to be built within the planning period, including resources and incentives and other relevant factors such as potential constraints, and the likelihood of availability for rent	IV-32
Existing Residential Units: number and affordability level of units rehabilitated, converted or preserved that meet the provisions of alternative adequate sites. In addition, this includes units in a motel, hotel, or hostel that are converted to residential units and made available to persons experiencing homelessness as part of a COVID-19 response and acquisition of mobile home park. If using this option, the adequate site alternative checklist must be provided.	N/A
Other: Jurisdictions are encouraged to consult with HCD regarding other alternative methods options including new manufactured housing park hook-ups, floating homes/live aboard berths, conversion of military housing, adaptive reuse of commercial uses, or other housing opportunities unique to the community to ensure their adequacy to accommodate RHNA.	N/A

Other Miscellaneous Requirements

Also see Technical Advisories issued by the Governor's Office of Planning and Research at:

[New state legislation related to General Plans Appendix C](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf)

(http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and [Fire Hazard Planning General Plan](http://opr.ca.gov/docs/Final_6.26.15.pdf)

[Technical Advice Series](http://opr.ca.gov/docs/Final_6.26.15.pdf) (http://opr.ca.gov/docs/Final_6.26.15.pdf)

Description of Requirement	Page Number
Description of the means by which consistency with the general plan will be achieved and maintained. (Gov. Code § 65583 subd. (c)(8))	I-2
Description of construction, demolition, and conversion of housing for lower- and moderate-income households within the Coastal Zone (if applicable). (Gov. Code § 65588 subds. (c) and (d))	N/A
Description of opportunities for energy conservation in residential development. (Gov. Code § 65583 subd. (a)(8))	IV-35
Description of consistency with water and sewer priority requirements pursuant to SB 1087 (Gov. Code § 65589.7)	I-2
Other elements of the general plan triggered by housing element adoption: <ul style="list-style-type: none"> • Disadvantaged Communities (Gov. Code § 65302.10) • Flood Hazard and Management (Gov. Code § 65302 subds. (d)(3) and (g)(2)(B)) • Fire Hazard (Gov. Code § 65302 and 65302.5) • Environmental Justice (Gov. Code § 65302 subd. (h)) • Climate Adaptation 	N/A

Comments:

Schedule of Actions/Programs

Government Code, section 65583, subdivisions (c)(1 – 7), and (10)

For adequate site programs See “Housing Element Sites Inventory Guidebook” at [HCD's technical assistance memos](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml) (https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml)

Program Description	Program numbers	Page number
<i>Program(s) to provide adequate sites (large/small sites, incentives for mixed use/nonvacant sites, publicly owned sites, annexation, etc)</i>		
If required: Program to accommodate a shortfall of adequate sites to accommodate the lower RHNA. This program must meet the specific criteria identified in Gov. Code § 65583.2 subd. (h) and (i).	AHO prog 5,6	VI-5
If required: Program to accommodate an unaccommodated need from the previous planning period pursuant to Gov code § 65584.09	N/A	
If required: Program when vacant/nonvacant sites to accommodate lower RHNA have been identified in multiple housing elements, if needed. (Gov. Code § 65583.2 subd. (c))	N/A	
If required: Program to provide replacement units when occupied by, or deed restricted to lower-income households within the last 5 years, if needed. (Gov. Code § 65583.2 subd. (g)(3))	AB 1397, Prog.5	VI-5
<i>Program(s) to assist in the development of housing to accommodate extremely-low, very-low, low or moderate-income households, including special needs populations</i>	5,6,7	IV-5,6,7
<i>Program to address governmental and nongovernmental constraints to the maintenance, improvement, and development of housing</i>	7, 9	IV-9,7
<i>Program(s) to conserve and improve the condition of the existing affordable housing stock</i>	11	VI-10

Comments:

Program Description	Program numbers	Page number
<i>Program(s) to promote and affirmative further fair housing opportunities</i>	1,2	VI-2,3
<i>Program(s) to preserve units at-risk of conversion from affordable to market-rate rents.</i>	N/A	N/A
<i>Program(s) to incentivize and promote the creation of accessory dwelling units that can be offered at an affordable rent.</i>	8	VI-9

☒ Do programs specify specific clear commitment, meaningful actions, that will have beneficial impact within the planning period?

☒ Do programs identify timing, objectives (quantified where appropriate), and responsible parties, if appropriate for implementation?

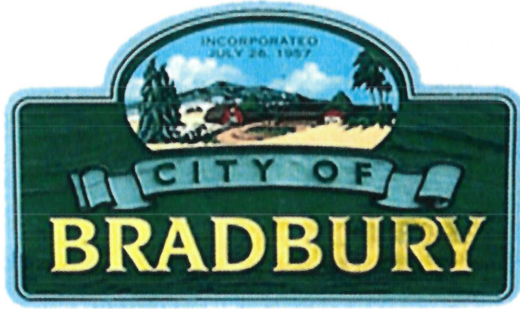
Quantified Objectives

Government Code, section 65583, subdivisions (b)

For an example table addressing this requirement visit [California Housing and Community Development Building Blocks](https://www.hcd.ca.gov/community-development/building-blocks/program-requirements/program-overview.shtml) (https://www.hcd.ca.gov/community-development/building-blocks/program-requirements/program-overview.shtml)

Description of Requirement	Page Number
Estimate the number of units likely to be constructed, rehabilitated and conserved or preserved by income level, including extremely low-income, during the planning period	VI-12

Comments:



Darlene Kuba, Chairperson (District 3)
Frank Hernandez, Vice Chairperson (District 1)
Chelsea Halbmam, Commission Member (District 5)
Robert Jones, Commission Member (District 4)
Melodie Szymkowski, Commission Member (District 2)

City of Bradbury Planning Commission Agenda Report

TO: Honorable Chairperson and Commission Members

FROM: Jim Kasama, City Planner

DATE: September 27, 2023

SUBJECT: DRAFT LAND USE ELEMENT UPDATE

PLANNING COMMISSION RESOLUTION NO. PC 23-317

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL ADOPTION OF AN UPDATE TO THE 2012-2030 LAND USE ELEMENT AND FINDING THAT THE ACTION IS EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO THE COMMON SENSE EXEMPTION OF CEQA GUIDELINES SECTION 15061(b)(3)

Attachment

Resolution No. PC 23-317 with Exhibits:

- A) Land Use Element
- B) Land Use Map

AGENDA ITEM NO. 8D

INTRODUCTION

The City has prepared and is in the process of adopting the 6th Cycle Housing Element Update (Housing Element Update) for the 2021-2029 planning period. The Housing Element Update necessitates updating of the land use information for an inventory of available sites for housing and sets forth a list of required programs that includes amendment of the Affordable Housing Overlay (AHO) on the Civic Center property. In reviewing the Land Use Element, it was noted that other land use related changes have occurred that have not been taken into account. These include the adoption of two specific plans; SP 05-01 for Sharon Hill Lane, and SP 06-02 for 555 Mt. Olive Drive; and the annexation along Wildrose Avenue at the entry to the Bradbury Estates. The proposed

updated Land Use Element is provided as Exhibit A of the attached Planning Commission Resolution No. PC 23-317.

PROPOSED LAND USE ELEMENT UPDATE

The Housing Element Update is required to include local housing programs that enable the City of meet the fair share allocation of the Regional Housing Needs Assessment (RHNA). To determine what programs are needed, the future development potential in the City is examined in the Land Use Element. The various properties that are available for development are presented in five categories. These inventories and the tables and maps have been updated.

Category 1 is comprised of the 302-acre area located in the northernmost part of the City and are listed in Table LU No. 3 – Open Space Privately Owned Undeveloped Hillside Parcels on page 12 of the Land Use Element. The General Plan Land Use Map (Attachment B) identifies this area as Agricultural/Estate Residential-Five Acres with a Specific Plan Overlay to indicate that a specific plan is required for the development of these properties.

Category 2 is comprised of 17 vacant undeveloped residentially designated and zoned parcels that are considered to be appropriate for single-family residential development – see Table LU-4 – Vacant Privately Owned Undeveloped Residential Parcels on page 13, and the Vacant Undeveloped Parcels map (Exhibit LU No. 4) on page 14 of the Land Use Element.

Category 3 has one lot that has been identified as underutilized. This property is on Royal Oaks Drive North (8527-023-020) and is a 2.75-acre parcel designated Agricultural/Estate Residential-One Acre and zoned A-1. There is the potential for this lot to be split for an additional single-family residential development.

Category 4 is for secondary living quarters and SB 9 units, which allows single-family lots to be developed with multiple dwelling units.

Category 5 is the Civic Center property. For the Housing Element Update, it is required that a specific site in the City be identified and zoned for affordable housing. The Civic Center is the one property that the City has control over, and therefore can be readily designated for affordable housing. In 2018, the Affordable Housing Overlay designation was placed on the entire Civic Center property. For the Housing Element Update, it is required that this site be able to accommodate 18 multi-family units and a 6-person emergency shelter. Since City Hall is not likely to be relocated, having the Affordable Housing Overlay designation on the entire Civic Center property is unrealistic. It is to be replaced with a new affordable housing overlay titled Affordable Housing Civic Center Overlay that is to be placed on the rear/easterly 0.68-acre portion of the Civic Center property. A new Affordable Housing Civic Center Overlay zone is to be created and applied to the Civic Center site. An ordinance to effectuate this has been drafted.

The various land use designations and accompanying zoning are listed on page 6 and in Table LU No. 1 – Land Use Designation and Zoning on page 7 and in Table LU No. 2 – Overlay Designations and Zoning on page 8 of the Land Use Element.

Specific Plans

Two specific plans have been approved and the properties have been accordingly developed but were never incorporated into the Land Use Element. These are the Sharon Hill Lane Specific Plan (SP 05-01) and the 555 Mount Olive Drive Specific Plan (SP 06-02). The Sharon Hill Lane Specific Plan comprises four single-family residential lots on a gated cul-de-sac at the northeast corner of the City. Two of the lots have been developed, and a new residence is being built on one of the lots. A fourth lot is vacant. This Specific Plan also includes a fifth lot that is dedicated as open space. The Land Use Map (see Exhibit B of the attached Resolution No. PC 23-317) has been revised to show Sharon Hill Lane and the open space as SP because the application of a specific plan to a property is no longer an overlay and replaces the underlying designation and zoning and should be shown as a distinct land use designation.

The 555 Mount Olive Drive Specific Plan provides for that property to be split into two lots and making the new southerly lot (585 Mount Olive Drive) available for development of a single-family residence. The property was divided, and a new residence has been built. The two lots are shown on the Land Use Map as SP.

Annexation

A Land Use Element is required by State law to address the logical and orderly development of property. Part of this includes a Sphere of Influence analysis to identify adjacent unincorporated county areas and other areas that could or should be part of the City. One of these areas was a triangular area along Wildrose Avenue at the entry to the Bradbury Estates. While this property is comprised of properties that are mostly within and accessed from within the Bradbury Estates, and is within the Bradbury Estates Community Service District, this area was a part of the City of Monrovia. This was illogical and was identified as an area to be annexed/reorganized to adjust the boundary between the City of Monrovia and the City of Bradbury to be consistent with the boundary of the Bradbury Estates Community Service District. This annexation/reorganization was initiated in 2016 and finalized in 2018. The boundary line on the various maps has been revised to reflect the annexation/reorganization.

ENVIRONMENTAL REVIEW

It is recommended that this project be determined to qualify as exempt under the provisions of the California Environmental Quality Act (CEQA) pursuant to the common sense exemption set forth in Section 15061(b)(3) of the CEQA Guidelines that CEQA only applies to projects which have the potential for causing a significant effect on the environment and where it can be seen with certainty that there is no possibility that the activity will have a significant effect, the activity is not subject to CEQA. The changes to the technical information for the proposed Land Use Element Update and renaming and clarifying the boundaries of the overlay on the Civic Center property will not have any physical impacts on the environment.

FINDINGS

In addition to the CEQA finding, the following findings are applicable to the Planning Commission decision:

- A. It is necessary to update the Land Use Element in conjunction with the Housing Element Update.
- B. The amendment to the Land Use Element will be consistent with the objectives, policies, and general policies of the other plans and elements of the Bradbury General Plan, including the 6th Cycle 2021-2029 Housing Element.
- C. The changes set forth herein represent good land use practices which are required by the public necessity, convenience, and the general welfare.

PLANNING COMMISSION ACTION

The Planning Commission is to open a public hearing and solicit testimony on the proposed Land Use Element Update. After the testimony, the Commission is to close the public hearing and determine that the findings can be made to recommend approval of the proposed Land Use Element Update and approve a motion to adopt the attached Resolution No. PC 23-317. The Commission's comments and specific recommendations will be transmitted to the City Council with the resolution.

ATTACHMENTS

Resolution No. PC 23-317 with Exhibits:

- A) Land Use Element
- B) Land Use Map

AGENDA ITEM NO. 8D – ATTACHMENT

PLANNING COMMISSION RESOLUTION NO. PC 23-317

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL ADOPTION OF AN UPDATE TO THE 2012-2030 LAND USE ELEMENT AND FINDING THAT THE ACTION IS EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO THE COMMON SENSE EXEMPTION OF CEQA GUIDELINES SECTION 15061(b)(3)

With Exhibits:

- A) Land Use Element
- B) Land Use Map

PLANNING COMMISSION RESOLUTION NO. PC 23-317

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL ADOPTION OF AN UPDATE TO THE 2012-2030 LAND USE ELEMENT AND FINDING THAT THE ACTION IS EXEMPT FROM THE CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA) PURSUANT TO THE COMMON SENSE EXEMPTION OF CEQA GUIDELINES SECTION 15061(b)(3)

WHEREAS, the City is adopting its 6th Cycle Housing Element for the 2021-2029 period; and

WHEREAS, the Housing Element sets forth a list of programs that the City is required to adopt in implementing the Housing Element; and

WHEREAS, several of these programs relate to placing an Affordable Housing Overlay (AHO) zone on the City Hall property, amending the City's Affordable Housing provisions, and developing objective standards for the development of housing in the AHO; and

WHEREAS, on September 18, 2018, the City Council placed an Affordable Housing Overlay onto the entire Civic Center site at 600 Winston Avenue; and

WHEREAS, the Affordable Housing Overlay is to be redesignated as the Affordable Housing Civic Center Overlay with clarification of the boundaries of the Overlay as shown in the 6th Cycle Housing Element; and

WHEREAS, there need to be technical clarifications to the Land Use Element which changes do not involve any environmental impacts; and

WHEREAS, on September 27, 2023, the Planning Commission of the City of Bradbury, California held a duly noticed public hearing on the draft Housing Element, and after the close of the public hearing the Planning Commission adopted Resolution No. PC 23-316 recommending that the City Council adopt the Housing Element; and

WHEREAS, on September 27, 2023, the Planning Commission of the City of Bradbury, California held a duly noticed public hearing to consider adoption of this Resolution, at which time it considered all evidence presented, both written and oral;

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF BRADBURY, DOES HEREBY RESOLVE, FIND, AND DETERMINE AS FOLLOWS:

SECTION 1. Findings.

A. The foregoing recitals are true and correct.

B. The amendment to the Land Use Element will be consistent with the objectives, policies, and general policies of the other plans and elements of the Bradbury General Plan, including the 6th Cycle 2021-2029 Housing Element.

C. The changes set forth herein represent good land use practices which are required by the public necessity, convenience, and the general welfare.

SECTION 2. Recommendation of Land Use Element. The Planning Commission hereby recommends to the City Council the approval and adoption of the Updated Land Use Element attached hereto as Exhibit A. The Land Use Element includes an updated Land Use Map, a copy of which is separately attached hereto as Exhibit B.

SECTION 3. CEQA. The Planning Commission further recommends that the City Council find that the Land Use Element Update is exempt from the California Environmental Quality Act (CEQA) under the common sense exemption of CEQA Guidelines section 15061(b)(3) as changing the technical information contained in the Land Use Element and renaming and clarifying the boundaries of the overlay on the Civic Center site will not have any physical impacts on the environment.

SECTION 4. Effective Date. This Resolution shall take effect immediately.

SECTION 5. Custodian of Record. Each and every one of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the Project. All summaries of information in the findings which precede this section are based on the entire record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The documents and materials that constitute the record of proceedings on which these findings are based are located in City Hall. The Custodian of Record is the City Clerk, Diane Jensen who can be reached at (626) 358-3218, or by email at djensen@cityofbradbury.org.

SECTION 6. Certification. The City Clerk shall certify to the adoption of this Resolution.

- - Signatures on next page - -

PASSED, APPROVED, AND ADOPTED this 27th day of September, 2023.

Chairperson

ATTEST:

City Clerk

I, Diane Jensen, City Clerk, hereby certify that the foregoing Resolution No. PC 23-317 was duly adopted by the Planning Commission of the City of Bradbury, California, at a regular meeting held on the 27th day of September, 2023, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

EXHIBIT A

Land Use Element

General Plan 2012-2030 Update

Land Use Element

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General Plan 2012 – 2030 Update Land Use Element

Purpose:

The purpose of the General Plan Land Use Element is to plan for and shape the future physical development of Bradbury. State Planning Law requires that General Plans establish land use designations for various areas in the plan, as well as standards for population density and building intensity. The Land Use Element serves as a guide for future development. The Element's relationship to other General Plan components is central for many aspects. Land use decisions influence: 1) capacity and service levels for transportation and utility systems; 2) housing availability; 3) preservation of resources; and 4) long-term effects related to economic prosperity.

History:

The City of Bradbury incorporated July 26, 1957. The boundaries lie within the northern part of the Rancho Azusa de Duarte, originally a 6,596-acre Mexican Land Grant given in 1841 to Andres Duarte. The original rancho included all of Bradbury and portions of the surrounding cities. It was developed and subdivided into 40+ acre parcels in the 1870's. Around 1883 Lewis Leonard Bradbury acquired 2,750 acres of the rancho which comprises the present day cities of Bradbury and Duarte.

The population of Bradbury grew from 518 in 1957 to 1,048 in 2010. The 2020 Census data places the City's population at approximately 920 persons. The City is divided into five council districts representing the various distinctive areas of this unique community. The boundaries of the council districts are adjusted every ten years based on the most current census population data.

Relationship to other General Plan Elements:

The Land Use Element responds to detailed State statutory requirements and it has a broad scope. Land Use issues overlap those of all of the other general plan elements. This element is internally consistent with the goals, objectives and policies contained in all of the remaining general plan elements.

Planning Boundary & Sphere of Influence:

As required by State Law, this Land Use Element contains text and maps that designate the future use and reuse of land and standards for residential density within the City and its Sphere of Influence. The General Plan Land Use Map, contained in this Element, graphically represents the City's vision for future development, enhancement and

conservation. The planning boundaries of the City are identified in Exhibit LU No.1 and they include the existing jurisdictional boundary and the City's Sphere of Influence Area.

Cities are required to enact and develop policies designed to promote logical and orderly development. Pursuant to Senate Bill SB 244 (adopted in 2011 and enrolled as Chapter 513), cities and counties are required to update their land use element to identify county islands adjacent to their city within their planning boundaries when, in doing so, it promotes logical development. To comply with SB 244, the planning boundaries for the City should include the 17-acre County Island, "Royal Oaks" retirement/skilled nursing facility. Since the property is a multi-family residential skilled nursing facility and the site is developed and urban services are provided by the same agencies utilized by the City of Bradbury no unexpected impacts to the City of Bradbury are anticipated.

The annexation of the Royal Oaks retirement/skilled nursing facility has been previously considered by Planning Commissions and City Councils. The concept of annexing this County Island into the City of Bradbury has been considered, reviewed and discarded. However, if future City Councils determine that annexation of this multi-family residentially developed property is appropriate, then detailed studies and analysis of the potential impacts would be prepared for consideration before any action is undertaken.

The City of Bradbury has not and does not include multifamily residential zones as a primary use, although multifamily is allowed in conjunction with single-family homes in the agricultural areas in the form of SRO developments and in the affordable housing overlay designations. An affordable housing overlay designation has only been placed on a portion of the Civic Center property at this time.

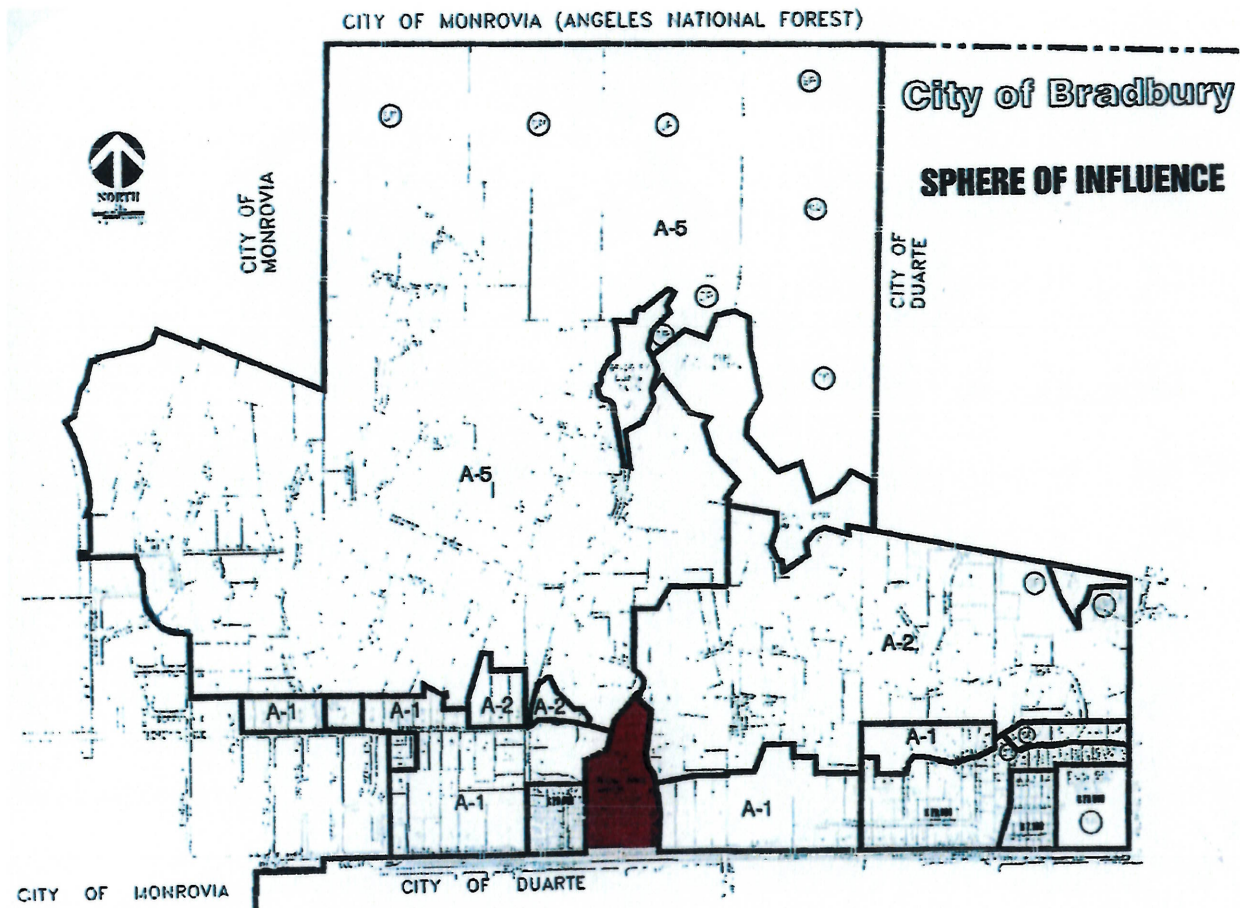


Exhibit LU No. 1
SPHERE OF INFLUENCE

Local Setting:

The City of Bradbury is a single-family residential community comprised of 1,219 acres of land (1.9 square miles). The community is almost fully developed with a variety of single-family detached residential dwelling units and accessory buildings and structures. Other land uses consisting of non-developable open space and miscellaneous public uses include: the 1.06-acre Civic Center; the 13-acre Royal Oaks Public Elementary School; 52 acres devoted to flood control owned and operated by the Los Angeles County Flood Control District; the 4.06 acres of privately owned land dedicated as open space; and approximately 4 acres owned by California American Water Company and used for water reservoirs.

The south/southeastern half of the City is divided in parcels ranging in size from 7,500 square feet to two (2) acres. The north/northwestern half of the City consists of large estate size parcels of land which range in size from two (2) acres to seventy (70) acres. Many of the parcels are located within areas of steep hillsides.

There are eight (8) vacant hillside parcels of land comprising approximately 302 acres which are located in the northern portion of the City adjacent to the City of Monrovia to the west, the City of Duarte to the east, and the Angeles National Forest to the north. One of the eight parcels constituting 1.03 acres belongs to California American Water Company (Cal-Am), a publicly traded private water company. More than half of this area has slopes in excess of fifty percent. The City recognizes that the eight (8) parcels of land have the opportunity to each be developed with one (1) main dwelling unit and secondary living quarters in accordance with the A-5 development standards of this Land Use Element and as set forth in the City's Development Code, including the Hillside Development Standards. The 2014 Land Use Update recognized that if these 302 privately-owned acres are developed, it will almost certainly be through the utilization of land division and development concepts, such as cluster development, that could be developed through a specific plan.

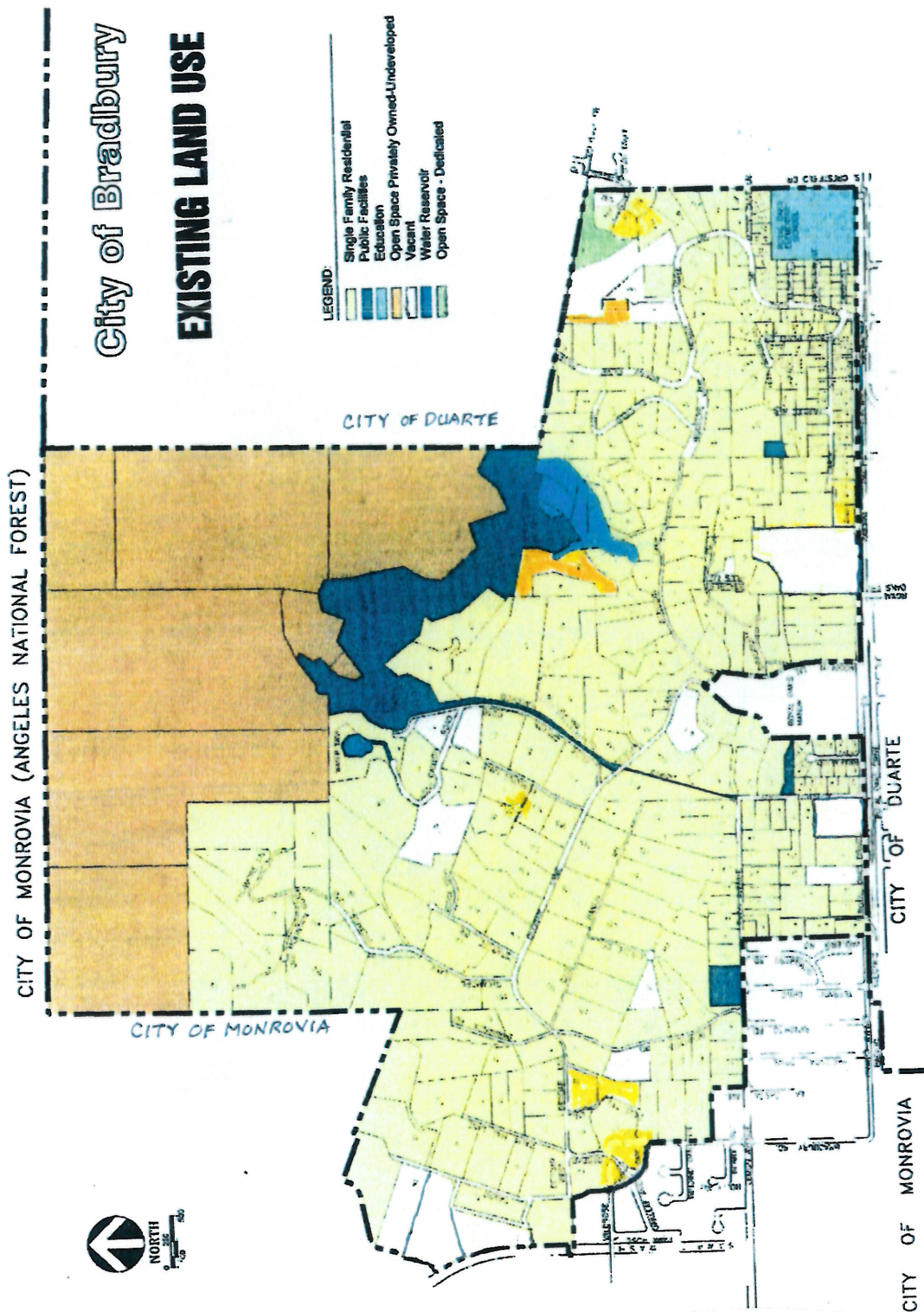
Since the time of the 2014 Update, the City received two applications for development of the area through specific plans, for a total of 23 additional estate homes, with the opportunity for 23 accessory dwelling units. Both applications have lapsed. This 2023 Update continues to recognize that limited access to this 302-acre area, lack of urban utilities and the potential existence of sensitive ecological areas and species may render these parcels very difficult to develop or potentially render them economically infeasible for residential estate development. The specific plans that were submitted show that if residential development of this area occurs, it will require the preparation, review, and approval of a specific plan which will allow special development design considerations to be used due to the severe site constraints. A specific plan overlay has therefore been placed on these eight (8) parcels.

Existing Land Uses:

The Bradbury General Plan Existing Land Use Map (Exhibit LU No. 2) identifies the existing uses of land, as opposed to the land use designation.

An analysis of the City's existing land uses identified seven categories: 1) Single-Family Residential; 2) Public Facilities; 3) Education; 4) Open Space, Privately Owned-Undeveloped; 5) Vacant; 6) Water Reservoir; and 7) Open-Space-Dedicated. Table LU No. 1 contains the area tabulations for the various land use and zoning designations. Exhibit LU No. 2 – Existing Land Use Map depicts the location of the various existing land uses.

Exhibit LU No. 2
EXISTING LAND USE MAP- 2023



Land Use Designations:

The desired development of land uses is implemented by the application of the various zone districts set forth in the City's Development Code. There is a direct correlation of development density and intensity between the designations in the Land Use Element and the regulations and standards contained in each of the City's zone districts. The City's zoning implements the community's long-standing desire to retain its rural, low-density single-family residential character. The entire City of Bradbury is zoned for single-family detached residential development with only minor exceptions. In addition to the nine General Plan Land Use designations, there are three overlay designations as well. However, multifamily units in the form of SRO developments are allowed in the A-1, A-2, and A-5 zones, and in the Affordable Housing Overlay and the Affordable Housing Civic Center Overlay zones.

The following General Plan Land Use designations are reflected in Exhibit LU-3. Tables LU-1 and LU-2 show the correlation between the land use designation and zone districts. Exhibit LU-3 and Table LU-1 reflect two specific plans which were overlooked in the 2014 Update.

- **Single-Family Residential – 7,500 square feet:** This category refers to single-family residential development on lots containing a minimum area of 7,500 square feet.
- **Single-Family Residential – 20,000 square feet:** This category refers to single-family residential uses on lots containing a minimum area of 20,000 square feet. School uses are also allowed in this zone.
- **Agriculture/Estate Residential – One Acre:** This category refers to agricultural uses of land and estate residential development on parcels at least one acre in size. Civic center uses are also allowed in this zone.
- **Agriculture/Estate Residential – Two Acres:** This category refers to agricultural uses of land and smaller estate residential development on parcels at least two acres in size.
- **Agriculture/Estate Residential – Five Acres:** This category refers to agricultural uses of land and large estate residential development on parcels at least five acres in size.
- **Open Space** – Private or public property that is used for open space purposes.
- **Open Space, Flood Control** – Areas owned and operated by the Los Angeles County Flood Control District for flood control purposes.
- **Public Facilities**– Areas used for public, quasi-public, and official uses and any other public or community functions, facilities and needs including schools, water reservoirs and the City's Civic Center.
- **Specific Plan** - This category refers to land for which a Specific Plan has been adopted.
- **Specific Plan Overlay** – This category refers to land which requires a Specific Plan to be adopted in order to be developed.
- **Affordable Housing Overlay:** This category refers to the use of residentially zoned land for affordable housing purposes at a density of 20-25 dwelling units per acre.
- **Affordable Housing Civic Center Overlay:** This category refers to the use of a portion of the Civic Center site for residentially zoned land for affordable housing purposes at a density of 20 – 35 units per acre.

**TABLE LU No.1
LAND USE DESIGNATIONS AND ZONING**

Land Use Designation	Zoning	Acres	Primary Permitted Land Use
Single-Family Residential - 7,500 square feet	R-7,500 Single-family Residential	8.00	Single-Family Residential
Single-Family Residential - 20,000 square feet	R-20,000 Single-family Residential	43.84	Single-Family Residential,
Agricultural/Estate Residential – One Acre	A-1 Agriculture Residential Estate	104.00	Single-Family Residential, Civic center
Agricultural/Estate Residential – Two Acres	A-2-Agriculture Residential Estate	195.94	Single-Family Residential
Agricultural/Estate Residential – Five Acres	A-5-Agriculture Residential Estate	786.31	Single-Family Residential
Open Space	Open Space Per SP 05-01 – Sharon Hill Lane Specific Plan	4.06	Open-Space
Open Space – Flood Control	Open Space	52.05	Flood control uses
Public Facilities	Open Space A-1 Agriculture Residential Estate R-20,000	18.02	Public Facilities for Education, Water Reservoirs, Civic Center
Specific Plan	SP 06-02 – 555 Mount Olive Dr. Specific Plan	1.70	Single-Family Residential
	SP 05-01 – Sharon Hill Lane Specific Plan	5.08	
TOTAL		1,219	

**TABLE LU No. 2
OVERLAY DESIGNATIONS AND ZONING**

Land Use Overlay Designation	Zoning	Acres	Permitted Land Use
Affordable Housing Overlay	Affordable Housing Overlay	NA	Affordable Housing
Affordable Housing Civic Center Overlay	Affordable Housing Civic Center Overlay	.68	Affordable Housing
Specific Plan Overlay	Specific Plan Overlay	6.78	Single-Family Residential
TOTAL		7.46	

[illegible]

Development:

Existing Development:

Almost the entire City is developed with single-family detached residential dwelling units. Property used for public facilities consists of: the Civic Center; Royal Oaks Public Elementary School; Los Angeles County Flood Control District owned Flood Control Debris Basins and Channels; and privately owned water reservoirs. The 2010 Census reported that the City of Bradbury had 400 dwelling units and a population of 1,048. It was reported that 46 dwelling units were vacant. The reported average household size was 3.1 persons per dwelling unit. According to the information contained in the City's 6th Cycle Housing Element for 2021 - 2029, the City currently has 385 dwelling units, 115 of which were unoccupied, and an overall household size of 3.09 persons per household.

There are three unique and distinct gated neighborhoods in the City known as the Bradbury Estates, the Woodlyn Lane Improvement Association and the Bradbury Hills Road and Lane Association. The remaining residential areas are traditional single-family detached residential neighborhoods that are accessed from public streets.

The Bradbury Estates is a gated community consisting of large residential parcels generally ranging in size from two to seventy acres. A unique feature of this community is that it is under the jurisdiction of a Community Services District (CSD) which was formed on December 28, 1995. The CSD has the stated responsibility to:

- Equip and maintain additional security services above and beyond that provided by the Los Angeles County Sheriff to protect and safeguard life and property; and
- The construction, opening, widening, extending, straightening, surfacing, and maintaining in whole or part of any street in the district; and
- The construction and improvement of bridges, culverts, curbs, gutters, drains and works incidental thereto.

The Woodlyn Lane Improvement Association is a gated community consisting of large residential parcels usually having a minimum of two-acres of land area.

The Bradbury Hills Road and Lane Association is a gated community consisting of large residential parcels usually having a minimum of two acres. There are 17 residential parcels that have access to the private streets, Bradbury Hills Road and Bradbury Hills Lane.

Public Facilities: Royal Oaks Public Elementary School is located within the City's corporate boundary and it occupies 13 acres located at the extreme southeast corner of the City. This school is operated by the Duarte Unified School District.

The Civic Center is located at 600 Winston Avenue in the south central portion of the City and the entire 1.06-acre site is dedicated for public use. The Civic Center contains a 2,400 square-foot facility that includes offices and a multi-purpose room that has been designed for meetings and civic functions.

Other public facilities include water reservoirs.

Future Development Potential:

Future development within the City falls into five categories.

Category 1 is comprised of a 302-acre area consisting of eight (8) parcels located in the most northern portion of the City, adjacent to the City of Monrovia and the Angeles National Forest (see Exhibit LU No. 4). The General Plan Land Use Map identifies this area as Agricultural/Estate Residential – Five Acres, for minimum five-acre lots. A specific plan overlay has been placed on this property which requires adoption of a specific plan for development. The area has been consistently zoned A-5 SP (Agriculture/Residential 5-acre minimum, Specific Plan), with a specific plan overlay. The projected increase of 23 units is based on previous application submittals; the 23 primary units would result in approximately 71 persons. Table LU No. 3 lists these parcels, which are shown on Exhibit LU No. 4.

Any development or further subdivision of the 302 acres would be subject to review and approval of a specific plan(s). Associated environmental studies will address the impacts and mitigation measures associated with any such future development. More than half of the area contains hillside slopes over 50%. The area also has numerous prominent ridgelines; Blueline streams; earthquake induced landslide zones; lack of existing public or private vehicular access; lack of existing public utilities, and habitat that could include sensitive or endangered flora and fauna. These development constraints lead one to consider that development of the area is physically and economically difficult. This area is further restricted by being located in an area designated as a Very High Fire Hazard Severity Zone in compliance with California State Law. A specific plan could be submitted to the City for consideration of the area's maximum development potential. Use of this steep hillside potentially environmentally sensitive area could include the creation of a conservation conservancy/easement; the use of development right transfer strategies, and cluster development concepts, at the owner's option.

Any development in this area would be subject to the hillside development standards that are applicable to any site that consists of at least two acres of land area having an average slope exceeding 10%, except as modified by a specific plan. The intent of the hillside development standards is to preserve the pristine hillside mountainous topography. Grading of the hillside property is restricted and controlled. The nature and extent of the grading and development restrictions are based on the average slope of the parcel under consideration.

TABLE LU No. 3 - CATEGORY 1
OPEN SPACE PRIVATELY OWNED UNDEVELOPED HILLSIDE PARCELS

	Parcel No.	Area	Zone	Land Use
1.	8527-001-001	41.40	A-5 (SP)	Estate 5-Ac
2.	8527-001-008	70.00	A-5 (SP)	Estate 5-Ac
3.	8527-001-009	20.54	A-5 (SP)	Estate 5-Ac
4.	8527-001-010	59.19	A-5 (SP)	Estate 5-Ac
5.	8527-001-012	59.30	A-5 (SP)	Estate 5-Ac
6.	8527-005-001	8.37	A-5 (SP)	Estate 5-Ac
7.	8527-005-002	1.03	A-5 (SP)	Estate 5-Ac
8.	8527-005-004	42.36	A-5 (SP)	Estate 5-Ac
	Total	302.19		

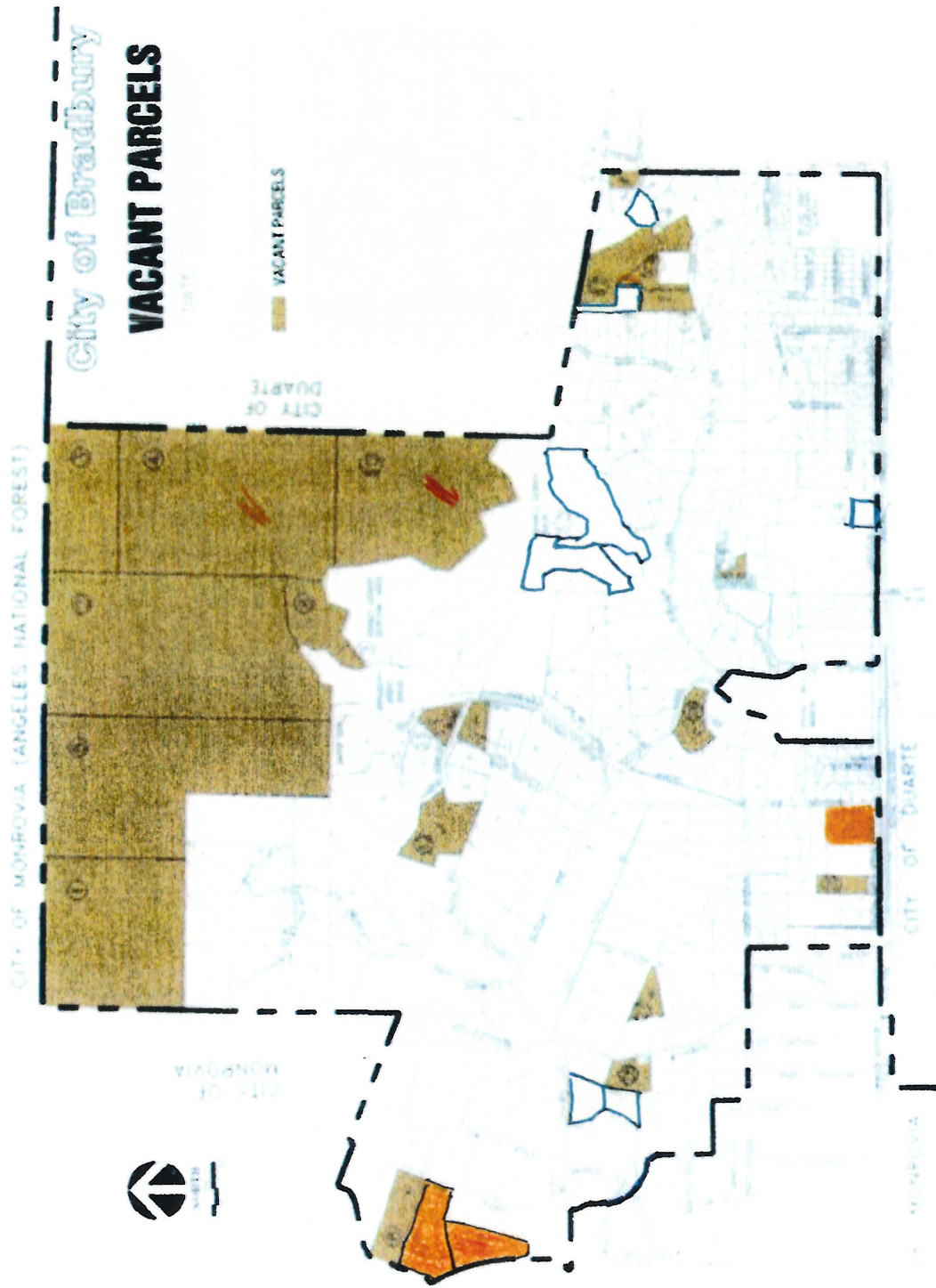
Category 2 is comprised of 17 vacant undeveloped residentially designated and zoned parcels. All of these sites are considered as appropriate for development for single-family detached residential dwelling units. (See Exhibit LU No. 4.) The identified vacant developable residential parcels on the 74.07 acres could theoretically yield 27 main dwelling units which could result in a projected population increase of an additional 83 persons. These parcels are identified in Table LU-4 and shown on Exhibit LU No. 4.

**Table LU-4 - CATEGORY 2
VACANT PRIVATELY OWNED UNDEVELOPED RESIDENTIAL PARCELS**

	APN	Address	Parcel Size (acres)	Zone	Land Use Designation	Potential Main DUs
1	8527-002-023	153 Sawpit Lane	5.58	A-5	Estate 5-Ac	1
2	8527-004-020	155 Bliss Canyon Rd.	2.12	A-5	Estate 5-Ac	1
3	8527-016-049	370 Mt. Olive Dr.	8.01	A-2	Estate 2-Ac	3
4	8527-016-019	360 Mt. Olive Dr.	2.03	A-2	Estate 2-Ac	1
5	8527-016-046	336 Mt. Olive Dr.	2.18	A-2	Estate 2-Ac	1
6	8527-016-037	1387 Sharon Hill Ln.	1.18	Sharon Hill Specific Plan	Specific Plan	1
7	8527-021-011	8 Bradbury Hills Rd.	1.54	A-2	Estate 2-Ac	1
8	8527-024-032	676 Deodar Ln.	5.3	A-5	Estate 5-Ac	1
9	8527-025-034	208 Barranca Road	3.39	A-5	Estate 5 Ac	1
10	8527-026-006	218 Deodar Ln.	2.90	A-5	Estate 5-Ac	1
11	8527-029-001	431 Long Canyon Rd.	2.54	A-5	Estate 5-Ac	1
12	8527-029-017	410 Long Canyon Rd.	7.16	A-5	Estate 5-Ac	1
13	8527-023-012	Royal Oaks Dr. N.	2.13	A-1	Estate 1-Ac	2
14	8527-023-021	1533 Royal Oaks Dr. N.	3.80	A-1	Estate 1-Ac	3
15	8527-002-029	99 Oak Meadow Ln.	7.16	A-5	Estate 5-Ac	1
16	8527-002-030	88 Oak Meadow Ln.	4.65	A-5	Estate 5-Ac	1
17	8527-021-041	1901 Royal Oaks Dr. N.	12.4	A-1	Estate 1-Ac	6
	Total		74.07			27

Category 3 is comprised of 1 underutilized 2.75 acre parcel in the A-1 zone (APN 8527-023-020) which has potential for development of an additional single-family detached residential dwelling which could result in an additional 3 persons.

Exhibit LU No. 4
VACANT UNDEVELOPED PARCELS



Category 4 is comprised of secondary living quarters and what are known as SB 9 units, which allow single-family parcels to be developed with multiple dwelling units. Secondary living quarters are permitted within all residential zones. The City is committed to providing living accommodations for all economic segments of the population.

Secondary Living Quarters – are accessory living quarters and accessory dwelling units, including junior accessory dwelling units, fire zone accessory dwelling units, and enhanced accessory dwelling units. Accessory living quarters include guest houses and single-room occupancy (SRO) developments. An SRO development consists of at least two SROs which are between 150 and 300 square feet of floor area with permanent provisions for living and sleeping and must include an efficiency kitchen, food preparation counter and storage cabinets that are of reasonable size in relation to the size of the SRO, as well as sanitation facilities in an adjacent room of up to 50 square feet.

SB 9 Units – are dwelling units allowed under the provisions of state law known as SB 9 which allow for up to four units to be developed on a single parcel, or 2 units on each parcel if the parcel is split.

According to the City's 6th Cycle Housing Element (2021 – 2029), there were approximately 104 second dwelling units compared to 385 primary units in the City. Applying this same statistic to the number of new dwelling units in Categories 1 – 3 above yields an additional 14 units. While the average household size in Bradbury is 3.09 persons per household (pph), there is a difference between the average owner size (3.26 pph) and the average renter size (2.33 pph). Given that category 4 is made up of smaller type units that will be rented, the renter person per household size should be used which could result in an additional 33 individuals.

Category 5 is comprised of the 0.68 acre area designated for affordable housing on the Civic Center property. This property has received an Affordable Housing Civic Center Overlay as shown in Exhibit LU No. 5. According to the City's 6th Cycle Housing Element, the area is to be developed with 18 affordable units and emergency shelter for 6 occupants, which could be in 3 units. As the affordable units will also be rental units, these 24 units could result in an additional 48 individuals.

EXHIBIT LU NO. 5 AFFORDABLE HOUSING CIVIC CENTER OVERLAY



Total Buildout:

The total buildout under this land use element is for an additional 86 units and 238 individuals.

Key Land Use Goals, Objectives, Policies and Action Programs

Mission Statement: Preserving Rural Tranquility is a policy as relevant now as it was decades ago when it was initially adopted. The mission statement provides guidance to local decision makers in the implementation of the community's land use policies.

Vision Statement: The City of Bradbury recognizes its unique single-family residential character and by maintaining fiscally responsible governance and development policies shall strive to provide a stable and sustainable rural community balancing preservation of natural open space with the needs of its residents for a quiet and safe place to live and raise their families, while providing for housing opportunities for all economic segments.

Land Use Goals

- Land Use Goal 1:** Maintain the existing rural residential character of the City. The Land Use Element designates the general location, distribution, and extent of existing and permitted development.
- Land Use Goal 2:** Preserve the identity, image and environmental quality of the hillside and open space areas in perpetuity by developing and enforcing the hillside development and other development standards.
- Land Use Goal 3:** Accommodates required density increases in areas which will have the least impact in the City.

Land Use Objectives

Land Use Objective 1: To maintain the existing character of the community and to preserve those environmental resources and amenities that make the City of Bradbury a desirable place to live.

Land Use Policies

Land Use Policy 1: The residential character of the community and environmental resources important to the City will be maintained.

Land Use Action Programs:

The City of Bradbury intends to complete the following items which address the objectives and policies of the Land Use Element of the General Plan:

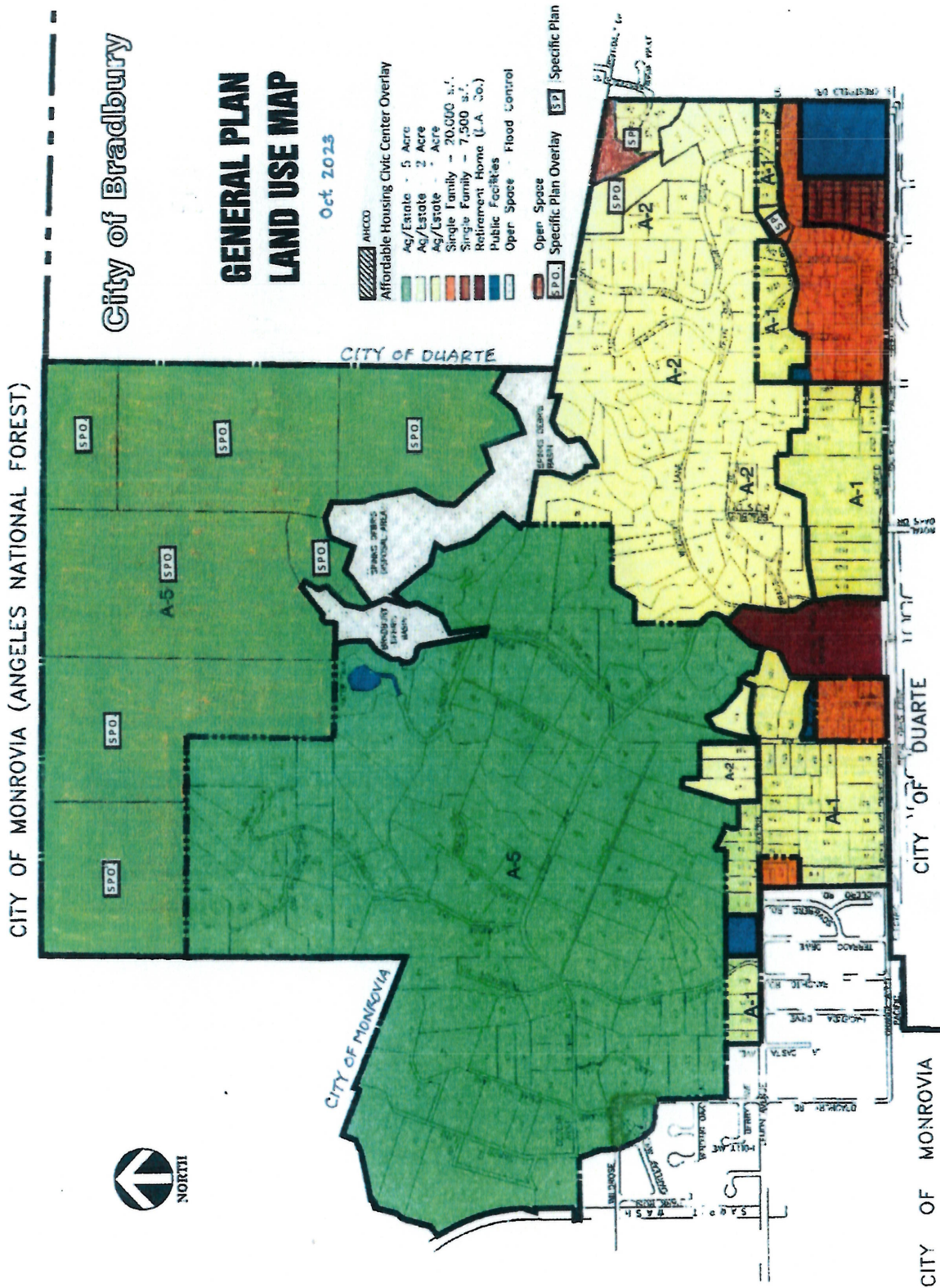
- Land Use Action 1:** Encourage as much hillside preservation as possible through the use of conservation easements, acquisition efforts by conservation organizations or preservation as natural preserves that promote the protection of natural hillsides as open space in perpetuity.
- Land Use Action 2:** Work with the City of Monrovia to adjust the common municipal boundaries to expand the City of Bradbury to the Wild Rose Avenue right-of-way to be consistent with the legal boundaries of the Bradbury Estates Community Services District. This was finalized in 2018.
- Land Use Action 3:** Revise the City's Design Guidelines to promote sustainable building and development design alternatives.
- Land Use Action 4:** Encourage the homeowner associations to consider the update or adoption of design guidelines for their respective jurisdictions.
- Land Use Action 5:** Engage the community and the homeowner associations to explore the need to control development intensity including but not limited to re-examination of lot coverage definitions, relationship of setbacks and building height and the ratio of main dwelling unit footprints to the total parcel size.
- Land Use Action 6:** Perform a biennial review of the Hillside Development Standards and update if necessary to carry out the goals of the General Plan.

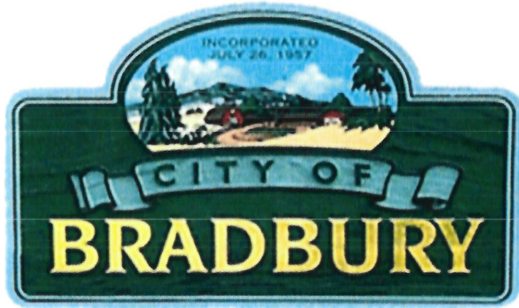
Land Use Action 7: Allow additional density for required multifamily development through SRO developments on the larger, agriculture lots.

Land Use Action 8: Allow increased density for affordable housing developments in those portions of the City which are not in steep hillsides and closer to major thoroughfares and amenities in other jurisdictions.

Land Use Action 9: Adopt objective development standards.

EXHIBIT B Land Use Map





Darlene Kuba, Chairperson (District 3)
Frank Hernandez, Vice Chairperson (District 1)
Chelsea Halbmam, Commission Member (District 5)
Robert Jones, Commission Member (District 4)
Melodie Szymkowski, Commission Member (District 2)

City of Bradbury Planning Commission Agenda Report

TO: Honorable Chairperson and Commission Members

FROM: Jim Kasama, City Planner

DATE: September 27, 2023

SUBJECT: A DRAFT ORDINANCE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE, REVISE IN ACCORDANCE WITH STATE LAW THE EMERGENCY SHELTER AND TRANSITIONAL AND SUPPORTIVE HOUSING PROVISIONS, ADD PROVISIONS RELATING TO LOW BARRIER NAVIGATION CENTERS, AND AMEND THE CITY OF BRADBURY ZONING MAP TO PLACE AN AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE

PLANNING COMMISSION RESOLUTION NO. PC 23-318

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF AN ORDINANCE AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE, REVISE IN ACCORDANCE WITH STATE LAW THE EMERGENCY SHELTER AND TRANSITIONAL AND SUPPORTIVE HOUSING PROVISIONS, ADD PROVISIONS RELATING TO LOW BARRIER NAVIGATION CENTERS, AND AMEND THE CITY OF BRADBURY ZONING MAP TO PLACE AN AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE

Attachments

- A) Draft Ordinance
- B) Resolution No. PC 23-318

AGENDA ITEM NO. 8E

INTRODUCTION

The City has prepared and is in the process of adopting the 6th Cycle 2021-2029 Housing Element Update (Housing Element Update). The Housing Element Update includes a program to amend the Affordable Housing Overlay (AHO) zone and place an Affordable Housing Overlay on the Civic Center property. This is to satisfy the requirement that there be a property available for multi-family affordable housing. The draft ordinance amends the Affordable Housing provisions and Overlay, creates a specific Affordable Housing Overlay, and places that Overlay on the Civic Center site. The proposed ordinance also codifies two Specific Plans and clarifies the Open Space zone uses. The draft ordinance is attached as Attachment A. The draft ordinance also makes other changes to Chapter 9.88 of the Development Code relating to affordable housing.

PROPOSED ORDINANCE

The City's Affordable Housing Overlay and provisions need to be updated to comply with State laws. First is to add a definition of Low Barrier Navigation Center, which is a type of shelter facility that provides services focused on getting people into permanent housing while providing temporary living facilities.

The draft ordinance amends the Zoning Districts and Zoning Map to include the two specific plans that have been approved. These are the Sharon Hill Lane Specific Plan (SP 05-01) and the 555 Mount Olive Drive Specific Plan (SP 06-02). Both specific plans have been implemented and need to be shown on the Zoning Map as separate zones to indicate that these properties have their own development regulations that are different from the previous underlying zones. The new Affordable Housing Civic Center Overlay zone is also added to the Zoning Districts and Zoning Map in furtherance of the programs of the Housing Element Update. Development standards have been added for both affordable overlay zones.

The City has had an Open Space zone for many years and through the Conditional Use Permit process, properties with this zone can be used for flood control, parks, water facilities, and electrical facilities. The only use permitted by right is nurseries and horticultural uses. While it may seem intuitive, it is not clear that this zone can provide for open spaces and the ordinance adds that as a permitted use, which is defined as follows:

Open space means any parcel or area of land or water essentially unimproved and set aside, dedicated, designated, or reserved for public or private use or enjoyment of owners, occupants and their guests, of land adjoining or neighboring such open space.

The bulk of the draft ordinance is for the amending of Chapter 88 for Affordable Housing Overlay Zones to bring the provisions into compliance with State law, and to place the new Affordable Housing Civic Center Overlay on the rear/easterly portion of the Civic Center property.

ENVIRONMENTAL REVIEW

Prior to this item, the Planning Commission will have considered the environmental documents and if they are found to be adequate, the Commission will have adopted Resolution No. PC 23-315 to recommend that the City Council adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Housing Element.

FINDINGS

The proposed ordinance is consistent with the City's General Plan and will further the Statewide housing goals and addresses the City's housing concerns.

PLANNING COMMISSION ACTION

The Planning Commission is to open a public hearing and solicit testimony on the proposed ordinance. After the testimony, the Commission is to close the public hearing and determine that the findings can be made to recommend approval of the proposed ordinance and approve a motion to adopt the attached Resolution No. PC 23-318. The Commission's comments and specific recommendations will be transmitted to the City Council with the resolution.

ATTACHMENTS

- A) Draft Ordinance
- B) Resolution No. PC 23-318

AGENDA ITEM NO. 8E – ATTACHMENT A

ORDINANCE NO. XXX

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF BRADBURY, CALIFORNIA AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE AND AMENDING THE CITY OF BRADBURY ZONING MAP TO PLACE THE AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE

ORDINANCE NO. XXX

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF BRADBURY, CALIFORNIA AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE AND AMENDING THE CITY OF BRADBURY ZONING MAP TO PLACE THE AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE

WHEREAS, the City has recently adopted its 6th Cycle Housing Element for the 2021 – 2029 period; and

WHEREAS, the Housing Element sets forth a list of programs that the City is required to adopt in implementing the Housing Element; and

WHEREAS, several of these programs relate to placing an Affordable Housing Overlay (AHO) zone on the Civic Center property, amending the City's Affordable Housing provisions, and developing objective standards for the development of housing in the AHO; and

WHEREAS, on September 27, 2023, the Planning Commission of the City of Bradbury, California held a duly noticed public hearing on the draft Housing, Land Use and Safety Elements and a draft of this Ordinance, and after the close of the public hearing the Planning Commission adopted Resolution No. PC 23-31 recommending that the City Council adopt this Ordinance as well as the other items; and

WHEREAS, prior to adopting this Ordinance, the City Council adopted Resolution No. XXX, approving a Mitigated Negative Declaration and adopting a Mitigation Monitoring and Reporting Program which documents cover the rezoning of the Civic Center property; and

WHEREAS, prior to adopting this Ordinance, the City Council adopted Resolution No. XXX, adopting an update to the Land Use Element; and

WHEREAS, on _____, 2023 the City Council of the City of Bradbury, California held a duly noticed public hearing to consider adoption of this Ordinance, at which time it considered all evidence presented, both written and oral.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BRADBURY, CALIFORNIA, DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. Section 9.25.020 of the Bradbury Municipal Code is hereby amended to add a definition of Low Barrier Navigation Center to read as follows:

Low barrier navigation center means a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. “Low barrier” means best practices to reduce barriers into entry of housing such as allowing the presence of partners, pets, and the storage of possessions.

SECTION 2. Section 9.58.030 of the Bradbury Municipal Code is hereby amended to read as follows:

All properties within the City are hereby placed in zones as indicated on the Zoning Map of the City. Said map, as the same may be amended from time to time, shall remain on file in the Office of the City Clerk.

TABLE 58-1. ZONING DISTRICTS

Zoning District	Map	Zoning District Name	General Plan Land Use Category Implemented by Zoning District
R-7,500		Single-Family Residential, 7,500 sq. ft. minimum	Single-Family Residential 7,500 sq. ft.
R-20,000		Single-Family Residential, 20,000 sq. ft. minimum	Single-Family Residential 20,000 sq. ft.
A-1		Agriculture Residential Estate, one acre minimum	Agricultural/Estate Residential, One Acre
A-2		Agriculture Residential Estate, two acre minimum	Agricultural/Estate Residential, Two Acres
A-5		Agriculture Residential Estate, five acre minimum	Agricultural/Estate Residential, Five Acres
OS		Open Space	Open Space
SP 05-01		Sharon Hill Lane Specific Plan	Specific Plan
SP 06-02		Mt. Olive Specific Plan	Specific Plan
SPO		Specific Plan Overlay	Specific Plan Overlay

Zoning District	Map	Zoning District Name	General Plan Land Use Category Implemented by Zoning District
AHO		Affordable Housing Overlay	Affordable Housing Overlay
AHCCO		Affordable Housing Civic Center Overlay	Affordable Housing Civic Center Overlay

SECTION 3. Section 9.76.020 of the Bradbury Municipal Code relating to permitted uses in the Open Space zone is hereby amended to read as follows:

Sec. 9.76.020. – Permitted uses.

The following uses shall be permitted uses within the OS zone:

- (1) Public or private dedicated open spaces.
- (2) Propagation nurseries and horticultural uses, provided that no dwellings, either temporary or permanent, be permitted in relation thereto, nor any on-premises sales or advertising.

SECTION 4. Chapter 9.88 of the Bradbury Municipal Code is hereby amended to read as follows:

CHAPTER 88. – AFFORDABLE HOUSING OVERLAY ZONES

Sec. 9.88.010. – Purpose.

The purpose of this chapter is to provide opportunities and regulations for development of various affordable dwelling units and supportive services designed to meet the needs of the affordable housing target population.

Sec. 9.88.020. – Applicability.

- (1) The Affordable Housing Overlay (AHO) zone may be assigned to any legally created parcel of land located within the various residential zones, provided that such site has adequate access and is provided with acceptable water and sewer or septic service for the intended use. In the event of any perceived conflict between the provisions of this chapter and any other provisions of this title, this chapter shall control.
- (2) The Affordable Housing Civic Center Overlay (AHCCO) zone is specifically assigned only to a portion of that parcel located at 600 Winston Avenue in the City of Bradbury. Unless otherwise specified, all provisions of the AHCCO zone are the same

as the AHO zone. In the event of any perceived conflict between the provisions of this chapter and any other provisions of this title, this chapter shall control.

Sec. 9.88.030. – Allowable land uses.

Any land use normally allowed in the primary zoning district may be allowed within the affordable housing overlay zone. In addition to the uses of land permitted by the primary zoning district, the following uses are permitted by right when they meet the development standards set forth herein:

(1) *Emergency shelter.* The use of a residential dwelling, whether single-family, multi-family, or a secondary dwelling unit for emergency shelter for homeless persons with minimal supportive services shall be approved by the City Manager, provided that the subject property and facilities meet the following development standards prior to occupancy:

- a. The site has or will be provided with water and sewer or septic service;
- b. The emergency shelter shall not be required to be located more than 300 feet from any other emergency shelter as measured from the property line;
- c. Required parking shall be based on the minimum spaces needed to provide sufficient parking to accommodate all staff working in the emergency shelter during one shift.
- d. Not more than six individuals, not including an on-site manager, shall reside in the facility at any one time, provided that the occupancy does not constitute overcrowding;
- e. No individual shall reside in the emergency shelter for more than 180 consecutive days;
- f. The client intake area shall not exceed 200 square feet;
- g. The facility shall have at least one on-site manager at all times;
- h. The facility shall be equipped with security provisions and lighting in compliance with the building and safety codes;
- i. Client intake shall be limited to the hours of 8:00 a.m. to 8:00 p.m. only.

(2) *Transitional housing.*

(3) *Supportive housing.*

(4) *Affordable housing.*

Sec. 9.88.040. – Allowable Land Uses – Affordable Housing Civic Center Overlay (AHCCO) Zone

In addition to the uses set forth in section 9.88.030, the AHCCO zone shall also allow:

- (1) *Low barrier navigation center* that meets the requirements of Government Code sections 65660 – 65668.

Sec. 9.88.050. – Development Standards for Affordable Housing Overlay (AHO) Zone.

For a use allowed in this zone, the following development standards shall apply:

- (1) Affordable housing. The housing development must provide a minimum of 20 percent affordable housing for lower income households or 100 percent affordable housing for moderate income households.
- (2) Density. The density in the AHO zone shall be a minimum of 20 dwelling units per acre and a maximum of 25 dwelling units per acre.
- (3) Required lot area. The lot area shall not be less than 7,500 square feet.
- (4) Lot width. A lot shall have a minimum average lot width of not less than 60 feet, not including any portion of the lot that is used only for access.
- (5) Setbacks.
 - (a) Setback from Public Streets. Any lot shall maintain a yard area of not less than 20 feet in depth for all stories and the basement level from a public street.
 - (b) Setback from Private Streets. No building including any basement level shall be located closer than 10 feet to any private street.
 - (c) Other setbacks. Except as specified in (a) and (b) above:
 - (i) Any one-story structure on any lot shall maintain setbacks of not less than five (5) feet.
 - (ii) Any two-story structure on any lot shall maintain setbacks of not less than ten (10) feet.
 - (iii) Any basement level of a structure on any lot shall maintain setbacks of not less than ten (10) feet.
- (6) Height limits. No building, structure, or improvement on any lot shall exceed a height of 28 feet and two stories. All measurements of height shall be made from the finished grade to the top of the highest ridge beam. Any rooftop fixtures and

appurtenances shall not extend more than two (2) feet above the surface of the roof. There may be one basement level of a depth of not more than ten (10) feet.

- (7) Off-street parking. An affordable multi-family housing development shall have and maintain off-street parking at the rate of one (1) parking space per three (3) dwelling units.
- (8) Improvement of setbacks and parkways. All parkways and landscaped portions of setback areas shall be landscaped in compliance with the State Water Efficient Landscape requirements.

Sec. 9.88.060. – Development Standards for Affordable Housing Civic Center Overlay (AHCCO) Zone

The following development standards shall apply to the AHCCO zone

- (1) Affordable housing. An affordable housing development in the AHCCO zone shall be required to be one hundred percent affordable to lower and moderate income households with at least fifty-five percent of the units available to lower income households.
- (2) Density. The density in the AHCCO zone shall be a minimum of 20 dwelling units per acre and a maximum of 35 dwelling units per acre.
- (3) Lot Dimensions. There are no minimum lot dimensions for the AHCCO zone.
- (4) Setbacks. The setbacks shall be the same as in the AHO zone.
- (5) Height limits. No building, structure, or improvement on any lot shall exceed a height of 35 feet and three stories. All measurements of height shall be made from the finished grade to the top of the highest ridge beam. Any rooftop fixtures and appurtenances shall not extend more than two (2) feet above the surface of the roof. There may be one basement level of a depth of not more than ten (10) feet.
- (6) Off-street parking. Parking shall be as required in the AHO zone.
- (7) Improvement of setbacks and parkways. Landscaping shall be as required in the AHO zone.

SECTION 5. The property located at 600 Winston Avenue (APN No. 8527-022-901) is hereby rezoned by placing the Affordable Housing Civic Center Overlay zone on such property as shown on Exhibit A and more particularly described in Exhibit B, both of which are attached hereto and incorporated herein by reference.

SECTION 6. The City Council hereby adopts the zoning map attached hereto as Exhibit C as the Official zoning map of the City.

SECTION 7. This Ordinance shall take effect on the 31st day after passage.

SECTION 8. Severability. If any provision of this Ordinance is held to be unconstitutional, it is the intent of the City Council that such portion of this Ordinance be severable from the remainder and that the remainder be given full force and effect.

SECTION 9. The City Clerk shall certify to the adoption of this Ordinance.

PASSED, APPROVED and ADOPTED this day of , 2023.

Richard T. Hale, Jr.
Mayor Pro Tem

ATTEST:

Diane Jensen
City Clerk

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) §.
CITY OF BRADBURY)

I, Diane Jensen, City Clerk of the City of Bradbury, do hereby certify that the foregoing ordinance, being Ordinance No. , was duly passed by the City Council of the City of Bradbury, signed by the Mayor of said City, and attested by the City Clerk, all at a regular meeting of the City Council held on the day of , 2023, that it was duly posted and that the same was passed and adopted by the following vote, to wit:

AYES:

NAYS:

ABSENT:

ABSTAIN:

Diane Jensen
City Clerk
City of Bradbury

Exhibit A

Plot Plan

Affordable Housing Civic Center Overlay Area

600 Winston Avenue, Bradbury, CA 91008

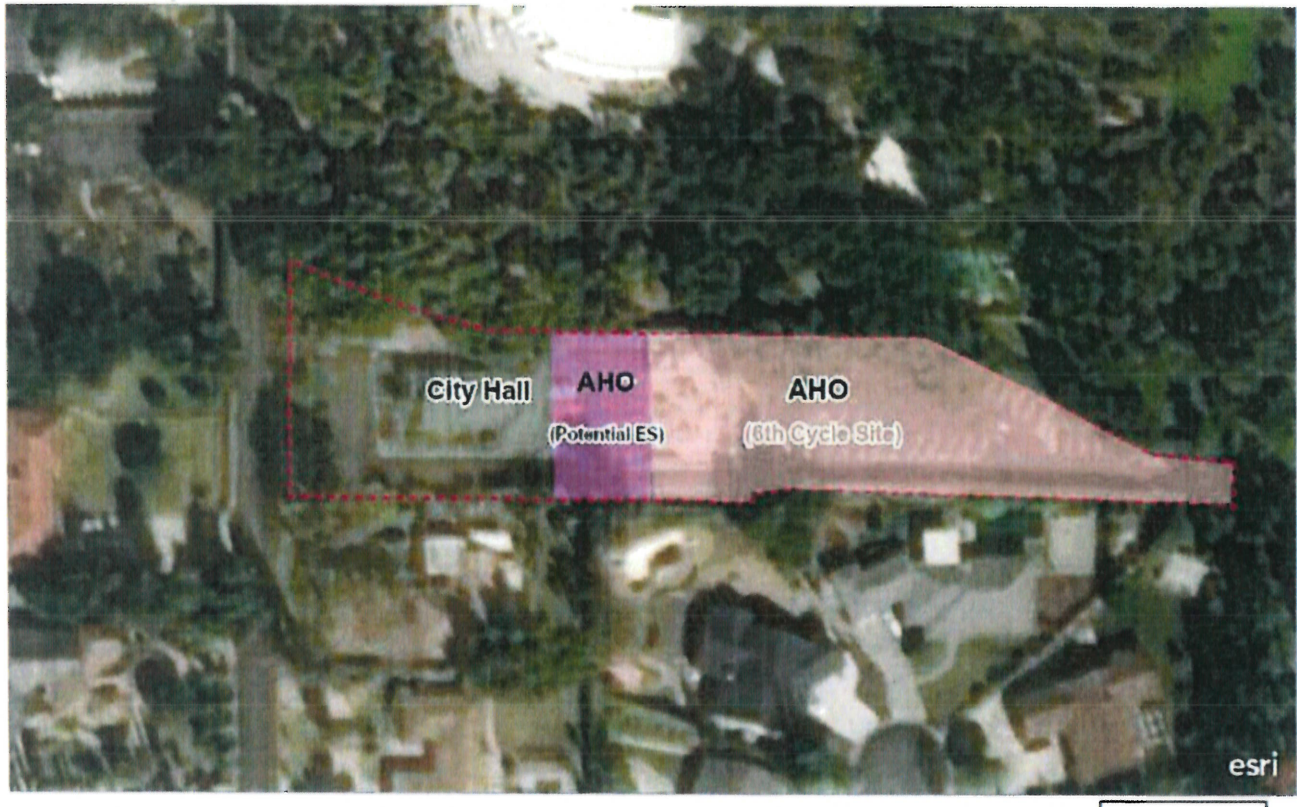


Exhibit B

Legal Description

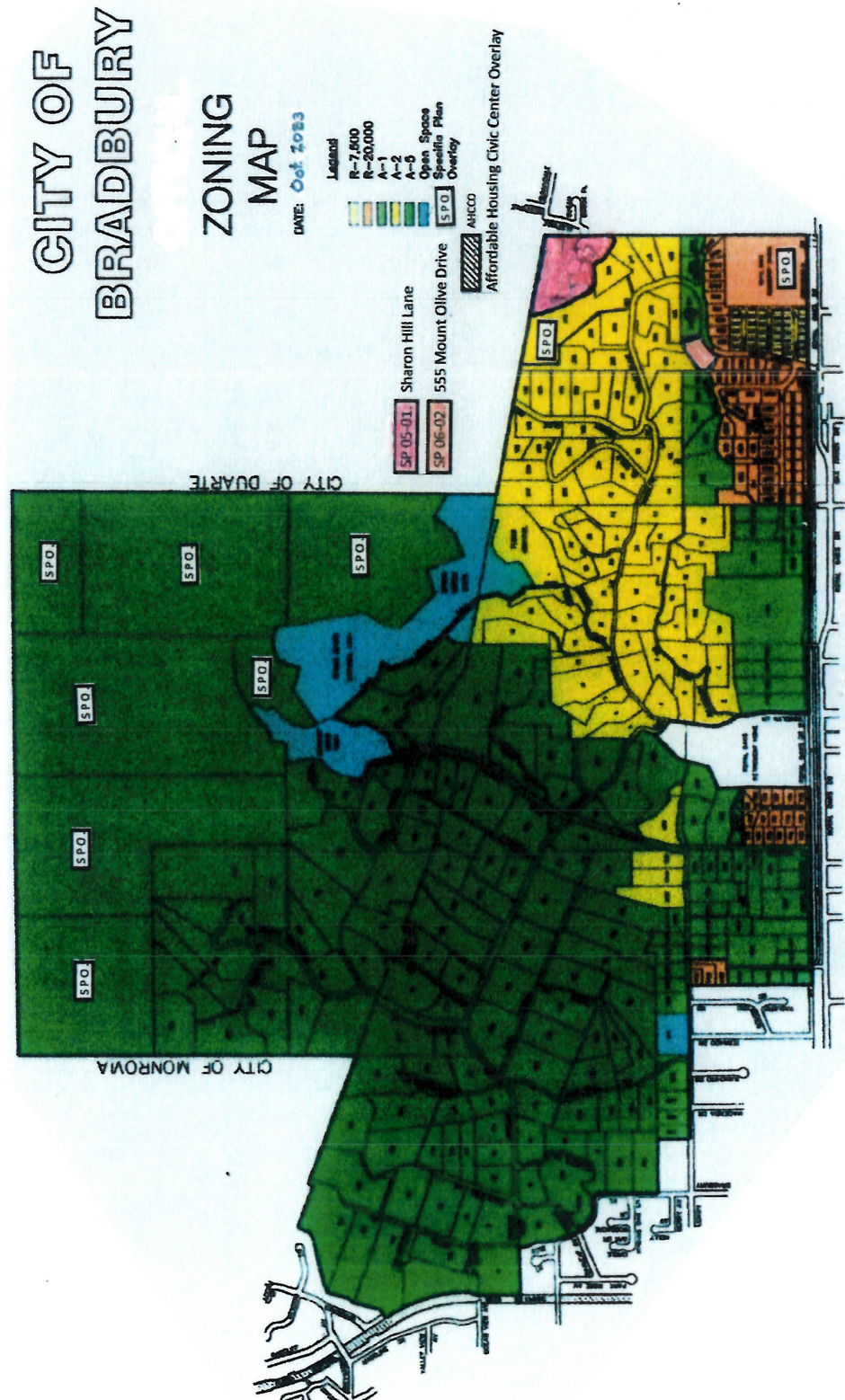
Affordable Housing Civic Center Overlay Area

600 Winston Avenue, Bradbury, CA 91008

- Being drafted -

Exhibit C

Zoning Map



AGENDA ITEM NO. 8E – ATTACHMENT B

PLANNING COMMISSION RESOLUTION NO. PC 23-318

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF AN ORDINANCE AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE, REVISE IN ACCORDANCE WITH STATE LAW THE EMERGENCY SHELTER AND TRANSITIONAL AND SUPPORTIVE HOUSING PROVISIONS, ADD PROVISIONS RELATING TO LOW BARRIER NAVIGATION CENTERS, AND AMEND THE CITY OF BRADBURY ZONING MAP TO PLACE AN AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE

PLANNING COMMISSION RESOLUTION NO. PC 23-318

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A DECISION TO RECOMMEND TO THE CITY COUNCIL APPROVAL AND ADOPTION OF AN ORDINANCE AMENDING TITLE IX – DEVELOPMENT CODE OF THE BRADBURY MUNICIPAL CODE TO IMPLEMENT HOUSING ELEMENT PROGRAMS RELATED TO THE AFFORDABLE HOUSING OVERLAY ZONE, REVISE IN ACCORDANCE WITH STATE LAW THE EMERGENCY SHELTER AND TRANSITIONAL AND SUPPORTIVE HOUSING PROVISIONS, ADD PROVISIONS RELATING TO LOW BARRIER NAVIGATION CENTERS, AND AMEND THE CITY OF BRADBURY ZONING MAP TO PLACE AN AFFORDABLE HOUSING OVERLAY ON A PORTION OF THE CIVIC CENTER PROPERTY LOCATED AT 600 WINSTON AVENUE.

WHEREAS, the City is adopting its 6th Cycle Housing Element for the 2021-2029 period; and

WHEREAS, the Housing Element sets forth a list of programs that the City is required to adopt in implementing the Housing Element; and

WHEREAS, several of these programs relate to placing an Affordable Housing Overlay (AHO) zone on the City Hall property, amending the City's Affordable Housing provisions, and developing objective standards for the development of housing in the AHO, which changes do not involve any environmental impacts; and

WHEREAS, on September 18, 2018, the City Council placed an Affordable Housing Overlay onto the entire Civic Center site at 600 Winston Avenue; and

WHEREAS, the Affordable Housing Overlay is to be redesignated as the Affordable Housing Civic Center Overlay with clarification of the boundaries of the Overlay as shown in the 6th Cycle Housing Element; and

WHEREAS, on September 27, 2023, the Planning Commission of the City of Bradbury, California held a duly noticed public hearing on the draft Housing Element, and after the close of the public hearing the Planning Commission adopted Resolution No. PC 23-316 recommending that the City Council adopt the Housing Element; and

WHEREAS, on September 27, 2023, the Planning Commission of the City of Bradbury, California held a duly noticed public hearing to consider adoption of this Resolution, at which time it considered all evidence presented, both written and oral;

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF BRADBURY, DOES HEREBY RESOLVE, FIND, AND DETERMINE AS FOLLOWS:

SECTION 1. Findings.

A. The foregoing recitals are true and correct.

B. The proposed ordinance will be consistent with the Bradbury General Plan, including the 6th Cycle 2021-2029 Housing Element.

SECTION 2. Recommendation of draft ordinance. The Planning Commission hereby recommends to the City Council the approval and adoption of the draft ordinance.

SECTION 3. CEQA. Prior to adopting this Resolution, the Planning Commission recommended that the City Council adopt the Mitigated Negative Declaration which was prepared for the Housing Element and the proposed Ordinance.

SECTION 4. Custodian of Record. Each and every one of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the Project. All summaries of information in the findings which precede this section are based on the entire record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The documents and materials that constitute the record of proceedings on which these findings are based are located in City Hall. The Custodian of Record is the City Clerk, Diane Jensen who can be reached at (626) 358-3218, or by email at djensen@cityofbradbury.org.

SECTION 5. Certification. The City Clerk shall certify to the adoption of this Resolution.

PASSED, APPROVED, AND ADOPTED this 27th day of September, 2023.

Chairperson

ATTEST:

City Clerk

I, Diane Jensen, City Clerk, hereby certify that the foregoing Resolution No. PC 23-318 was duly adopted by the Planning Commission of the City of Bradbury, California, at a regular meeting held on the 27th day of September, 2023, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

AGENDA ITEM NO. 9A

DEVELOPMENT PROJECT STATUS REPORT

SEPTEMBER 2023

City of Bradbury
Development Project Status Report – September 2023

Address Approval Doc. & Date	Project Description	Status
11 Deodar Ln. PC 15-249 11-18-2015	New 12,882 sf residence & 1,150 sf accessory structure	Under construction – permit issued 12-11-2018
23 Woodlyn Ln. PC 22-300 2-23-2022	New 2-story 6,300 sf residence & 1,000 sf 4-car garage	Under construction – permit issued 12-20-2022
28 Dovetail Ln. PC 22-301 4-27-2022	New residence, swimming pool with jacuzzi & convert existing residence to guest house	Submitted for plan check 11-8-2022
76 Palm Hill Ln. MAR 22-005 9-13-2022	470 sf open trellis structure and interior remodel to remove loft area and replace sliding glass door. Remodel pool and spa, new detached covered patio with BBQ and fire pit	Under construction – permit issued 1-18-2022 Under construction – permit issued 9-14-2022
100 Sycamore Ln. MAR 22-007 8-11-2022	Remodel and add approximately 94 sf. with new driveway entry and street improvements per HOA	Submitted for plan check 8-22-2023
158 Sawpit Ln. PC 22-302 4-27-2022	10,325 sf addition – 2 stories and basement	Preparing for plan check
188 Deodar Ln. PC 14-234 2-26-2014	New 14,780 sf residence, 2,450 sf guest house, 1,191 sf detached garage, swimming pool, water features and tennis court	Under construction – permits issued 3-11-2016
255 El Cielo Ln. PC 20-291 8-26-2020 MAR 23-003	3,800 sf of 2-story additions New swimming pool and spa	Under construction – Bldg. permit issued 1-19-2022. Pool permit issued 6-22-2023
320 Sycamore Ln. MAR 19-009 12-10-2019	783 sf addition	Under construction – permit issued 1-14-2021
331 Deodar Ln. MAR 22-001 1-11-2022	Convert garage to home gym and add new 2-car garage.	Under construction – permit issued 1-19-2022
368 Old Ranch Rd. (Old address 135 Circle Dr.) PC 21-299 5-26-2021	New 15,400 sf 2-story residence, 942 sf semi-attached guest house, two 3-car garages, tennis court, and swimming pool with spa	Under construction – permits issued 9-1-2022
406 Mt. Olive Dr. CC 19-07 3-19-2019	New 2-story main residence & remodel existing 1,704 sf residence to guest house	Grading Permit issued 10-5-2021. Building plans ready for permits

Address Approval Doc. & Date	Project Description	Status
409 Deodar Ln. PC 23-310 5-30-2023	New 9,500 sf 2-story residence with 1,500 sf attached garage, 8,200 sf of accessory structures, swimming pool & tennis court	Preparing for plan check. Demo permit issued 7-11-2023. Grading issued 8-3-2023.
506 Deodar Ln. PC 13-227.PC 10-23-2013 PC 18-276 6-27-2018 PC 19-286 10-23-2019 PC 22-305 5-25-2022 & 393 Old Ranch Rd. PC 22-305 5-25-2022	New 1-story 42,123 sf residence with basement, guest suites and pool house New tennis court, pitch-and-putt area, gardens, 2 nd entry gate and driveway	Permit issued 2-12-2016 – construction suspended. 3 plan modifications approved; 6-27-2018, 10-23-2019 and 5-25-2022. Plans being prepared for plan check. Under construction – Bldg. permits issued 4-6-2023. Landscaping permit and tennis court plan check issued 7-25-2023. Grading permit issued 8-9-23.
660 Deodar Ln. PC 23-308 2-22-2023	1,550 sf patio cover, 1,820 sf swimming pool & 2,000 sf of pool area decking	Submitted for plan check 4-23-2023
703 Braewood Dr. PC 23-309 3-22-2023	New detached accessory buildings – Craft shop 513 sf and patio trellis 371 sf	Under construction – permit issued 8-29-2023
1388 Sharon Hill Ln. PC 14-237 PC 22-306 7-27-2022	Renew AR 14-009 for 242 sf bath & sauna addn, 924 sf cabana with fireplace and bbq, and 177 sf gazebo with oak tree and landscaping remediation.	Preparing for plan check
1390 Sharon Hill Ln. PC 17-268 7-26-2017 MAR 23-002 Submitted 4-12-2023	New 2-story 8,810 sf residence New swimming pool and spa, patio cover and solar	Under construction – permit issued 2-18-2021 Under construction – permits issued 6-13-2023
1433 Lemon Ave. PC 22-303 4-27-2022	Interior and exterior remodel with change in architectural style	Under construction – permits issued 3-29-2022 and 5-3-2022
1456 Lemon Ave. PC 20-292 12-2-2020 MAR 21-001 5-11-2021 PC 22-307 7-27-2022	Exterior remodel, addition of entry gate tower, and relandscape west portion of front yard. Expand existing 660 sf 3-car garage to 1,188 sf 4-car garage.	Under construction – permit issued 9-21-2021 Preparing for final inspections
1550 Lemon Ave MAR 21-007 9-30-2021	Remodel and add 310 sf to existing garage for a 4-car garage. Remodel 2,800 sf house & add 542 sf. Relandscape & install new perimeter fence & gate.	Under construction – Garage permit issued 3-8-22. House & landscaping issued 11-8-22
2402 Mt. Olive Lane	710 sf attached Accessory Dwelling Unit	Permit issued 8-15-2023