

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

City of Bradbury Agenda Report

TO: Honorable Mayor and Council Members

FROM: Kevin Kearney, City Manager
Lisa Kranitz, Assistant City Attorney

DATE: November 7, 2023

SUBJECT: 2021-2029 (6TH CYCLE) HOUSING ELEMENT
CITY COUNCIL RESOLUTION NO. 23-22

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BRADBURY,
CALIFORNIA, SETTING FORTH THE FINDINGS OF FACT AND A
DECISION TO APPROVE AND ADOPT THE 6TH CYCLE 2021-2029
HOUSING ELEMENT**

Attachments

- 1) HCD Letter of October 19, 2023
- 2) Resolution No. 23-22 with Exhibits:
 - A) 2021-2029 Housing Element
 - B) Housing Element Completeness Checklist

SUMMARY

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

AGENDA ITEM NO. _____

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. HCD contacted City staff with preliminary comments, and met with City staff on October 10, 2023, to discuss the comments. City staff and HCD agreed on final revisions needed for approval, and on October 11, 2023, the final revised 6th Cycle Housing Element was posted – see Exhibit A of the attached Resolution No. 23-22 (Attachment 2).

HCD provides a Housing Element Completeness Checklist – see Exhibit B of Resolution 23-22, that outlines the requirements for a Housing Element to conform with State Housing Element Law. On October 19, 2023, HCD issued the attached letter (Attachment 1) stating that the Housing Element Update meets the statutory requirements of State Housing Element Law. It is recommended that the City Council approve the 2021-2029 6th Cycle Housing Element Update and adopt the attached Resolution No. 23-22.

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 Update 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 Land Use Element was amended to place the Affordable Housing Overlay designation 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 therefore to be replaced with a new affordable housing overlay titled, Affordable Housing Civic Center Overlay (AHCCO) that is to be placed on the rear/easterly 0.68-acre portion of the Civic Center property. An ordinance will create the new AHCCO zone and apply it to the rear of the Civic Center site.

The Planning Commission held a public hearing on September 27, 2023, at which time the Commission adopted Resolution No. PC 23-316, recommending that the City Council adopt the Housing Element Update.

FINANCIAL REVIEW

There will be no additional financial cost to the City associated with adoption of the Housing Element Update as the amendments implement what the City is already required to do by State law.

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 City Council will have considered the environmental documents and if they are found to be adequate, the Council will have adopted Resolution No. 23-21 to adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Housing Element.

PUBLIC NOTICE

At least ten days prior to the November 7, 2023, Special Meeting, a notice of the public hearings on the agenda was mailed to the owners of every property in the City, to those

parties and entities that had requested to be notified, and posted at the three locations in the City required by City Council Resolution No. 1226.

FINDINGS

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

- A. It is necessary to update the City's Housing Element to comply with State law, and the 2021-2029 Housing Element has been prepared in accordance with State law.
- B. The City has considered the comments 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.

RECOMMENDATION AND ACTION

The City Council is to open a public hearing and solicit testimony on the Housing Element Update.

After the testimony, the Council is to close the public hearing and it is recommended that the Council determine that the findings can be made to approve and adopt the 2021-2029 Housing Element and approve a motion to adopt the attached Resolution No. 23-22.

ATTACHMENTS

- 1) HCD Letter of October 19, 2023
- 2) Resolution No. 23-22 with Exhibits:
 - A) 2021-2029 Housing Element
 - B) Housing Element Completeness Checklist

ATTACHMENT 1

**HOUSING AND COMMUNITY DEVELOPMENT (HCD)
LETTER OF OCTOBER 19, 2023**

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

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



October 19, 2023

Kevin Kearney, City Manager
City of Bradbury
600 Winston Avenue
Bradbury, California 91008

Dear Kevin Kearny:

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

Thank you for submitting the City of Bradbury's (City) revised draft housing element received for review on August 22, 2023. The California Department of Housing and Community Development (HCD) also received revisions on October 19, 2023 that were made available to the public for seven days. Pursuant to Government Code section 65585, HCD is reporting the results of its review.

The revised draft element, incorporating the revisions submitted, meets the statutory requirements of State Housing Element Law described in HCD's June 5, 2023 review. However, the housing element cannot be found in substantial compliance until the City has completed necessary rezones to make prior identified sites available or address the shortfall of sites to accommodate the regional housing needs allocation (RHNA) pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021) as described below. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq) when the necessary rezoning is complete and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

Pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), a jurisdiction that failed to adopt a compliant housing element within one year from the statutory deadline cannot be found in compliance until rezones to make prior identified sites available or accommodate a shortfall of sites are completed pursuant to Government Code section 65583, subdivision (c) (1) (A) and Government Code section 65583.2, subdivision (c). As this year has passed and Program 5 (Sites Inventory) has not been completed, the housing element will remain out of compliance until the rezoning has been completed. Once the City completes the rezone, a copy of the resolution or ordinance should be transmitted to HCD. HCD will review the documentation and issue correspondence identifying the updated status of the City's housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element

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

For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication of the housing element update team. Their efforts and commitment to effectively plan for Bradbury's existing and future housing needs are commendable. HCD looks forward to receiving the City's adopted housing element. If you have any questions or need additional technical assistance, please contact Margaret Scarpa at Margaret.Scarpa@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

ATTACHMENT 2

CITY COUNCIL RESOLUTION NO. 23-22

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
BRADBURY, CALIFORNIA, SETTING FORTH THE FINDINGS
OF FACT AND A DECISION TO APPROVE AND ADOPT THE
6TH CYCLE 2021-2029 HOUSING ELEMENT**

Exhibits:

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

RESOLUTION NO. 23-22

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BRADBURY, CALIFORNIA, AMENDING THE BRADBURY GENERAL PLAN BY ADOPTING THE 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 approved a consulting agreement with Veronica Tam and Associates for consulting services relating to 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 a 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 in

accordance with State law requirements at which time it took into consideration all evidence presented, both oral and written; and

WHEREAS, at the close of the public hearing the Planning Commission adopted Resolution No. PC 23-316, recommending adoption of the Revised 6th Cycle Housing Element by the City Council; and

WHEREAS, City staff met with HCD on October 10, 2023 to discuss the review and comments on the last submittal to HCD of the Revised 6th Cycle Housing Element, and City Staff and HCD agreed on the final additions and revisions needed for approval of the Revised 6th Cycle Housing Element; and

WHEREAS, on October 11, 2023, the City posted the Revised 6th Cycle Housing Element with the final additions and revisions agreed upon with HCD on the City website; and

WHEREAS, on October 19, 2023, HCD issued a letter stating that the Revised 6th Cycle Housing Element as posted on October 11, 2023, meets the statutory requirements of State Housing Element Law; and

WHEREAS, on November 7, 2023, the City Council held a duly noticed public hearing on the Revised 6th Cycle Housing Element, Exhibit A attached hereto and incorporated herein by reference, at which time it considered all evidence presented, both written and oral; and

WHEREAS, prior to adopting this Resolution, the City Council adopted Resolution No. 23-21 adopting the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Housing Element;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BRADBURY DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. Findings. The City Council 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 Council 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 the attached Exhibit B, the Housing Element Completeness Checklist, 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. Adoption. Based on the above, the City Council hereby adopts the 6th Cycle Housing Element for 2021-2029 and directs the City Manager to submit the document to HCD for certification.

SECTION 3. Modification. The City Council hereby authorizes the City Manager to make all non-substantive changes or amendments 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. Effective Date. This Resolution shall become effective immediately.

SECTION 5. Certification. The City Clerk shall certify to the passage of this Resolution.

SECTION 6. 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 7th day of November 2023.

Mayor

ATTEST:

Diane Jensen, City Clerk

I, Diane Jensen, City Clerk, hereby certify that the foregoing Resolution No. 23-22 was duly adopted by the City Council of the City of Bradbury, California, at a special meeting held on the 7th day of November 2023, by the following vote:

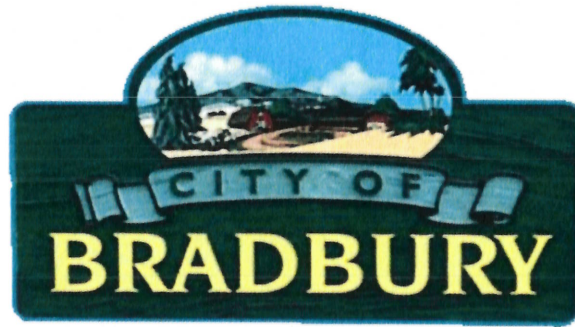
AYES:

NOES:

ABSTAIN:

ABSENT:

EXHIBIT A
2021-2029 Housing Element



2021-2029 Housing Element

Draft June 2022

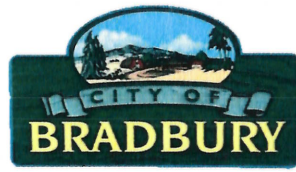
Revised Draft August and October 2023

Bradbury City Hall
600 Winston Avenue
Bradbury, CA 91008

Table of Contents

I. Introduction.....	I-1
A. Purpose.....	I-1
B. Public Participation.....	I-1
C. Consistency with State Planning Law and General Plan	I-2
D. Housing Element Planning Period.....	I-2
E. Housing Element Organization.....	I-2
F. Information Resources	I-3
G. The Unique Character of the City of Bradbury	I-3
II. Demographic Characteristics	II-1
A. Population	II-1
B. Age Distribution.....	II-1
C. Race and Ethnicity	II-2
D. Household Income	II-3
E. Employment Trends.....	II-4
F. Household Type.....	II-5
G. Existing Housing Stock in Bradbury	II-6
H. Secondary Living Quarters, Single Room Occupancy, and Accessory Dwelling Units	II-7
I. Housing Values.....	II-8
III. Housing Needs Assessment.....	III-1
A. Regional Housing Needs Assessment.....	III-1
B. Overcrowding	III-2
C. Housing Cost Burden.....	III-3
D. Special Housing Needs	III-4
E. Units at Risk.....	III-8
IV. Housing Constraints & Resources.....	IV-1
A. City Development History	IV-1
B. Residential Land Use	IV-2
C. Provision for a Variety of Housing Types	IV-4
D. Housing for Persons with Disabilities.....	IV-16
E. Building Codes and Enforcement	IV-17
F. Site Improvement Constraints.....	IV-17
G. Fees and Other Exactions.....	IV-18
H. Processing and Permit Procedures	IV-20
I. Local Ordinances	IV-22
J. Transparency in Development Regulations	IV-22
K. Non-Governmental Constraints	IV-23
L. Environmental Constraints.....	IV-25
M. Infrastructure Constraints.....	IV-26
N. Future Development Potential	IV-26
O. Energy Conservation and Climate Action Plan	IV-34

V. Review of Housing Element Performance	V-1
A. Progress in Implementing the 2014-2021 Housing Policies and Programs.....	V-1
B. Addressing the 2014-2021 Housing Element Objectives	V-6
VI. Housing Policies, Programs, & Quantified Objectives.....	VI-1
A. Housing Policies and Programs	VI-1
B. Quantified Objectives	VI-11
Appendix A: Public Outreach.....	A-1
Appendix B: Affirmatively Furthering Fair Housing	B-1
A. Introduction and Overview of AB 686	B-1
B. Overview of Bradbury	B-2
C. Assessment of Fair Housing Issues.....	B-4



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. A 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 August 15, 2023 and sent to HCD on August 22, 2023. On September 27, 2023, the Planning Commission conducted a meeting to review the revisions sent to HCD

On October 9, 2023, the City received additional comments from HCD on the Revised Draft Housing Element. The City made revisions and posted the Revised Housing Element on City website on October 11, 2023 and resubmitted the Revised Element to HCD after seven days on October 18, 2023.

To solicit additional input from stakeholders, the City updated the contact list and conducted direct outreach to agencies and organizations within interests in affordable housing in San Gabriel Valley. These agencies were sent either a direct email to the appropriate representative or mailed a letter inviting their input on the City's Housing Element.

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 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

	#	%
Total:	115	
For rent	5	4.3%
Rented, not occupied	0	0.0%
For sale only	22	19.1%
Sold, not occupied	5	4.3%
For seasonal, recreational, or occasional use	31	27.0%
For migrant workers	0	0.0%
Other vacant ¹	52	45.2%
<p>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 Source: 2015-2019 ACS.</p>		

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. Combining 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.sgvvc.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	October 2022 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	Azusa	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 Azusa, 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
<i>City of Bradbury, Planning and Development Fee Schedule, 2013.</i>	
<i>Notes:</i>	
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
<i>Source: City of Bradbury, Planning Division, 2022.</i>	
<i>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.</i>	

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 capacity is based on these previous proposals.**

**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	0	9
	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	14	37

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 Developments (2+ units per development) 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. 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.

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.

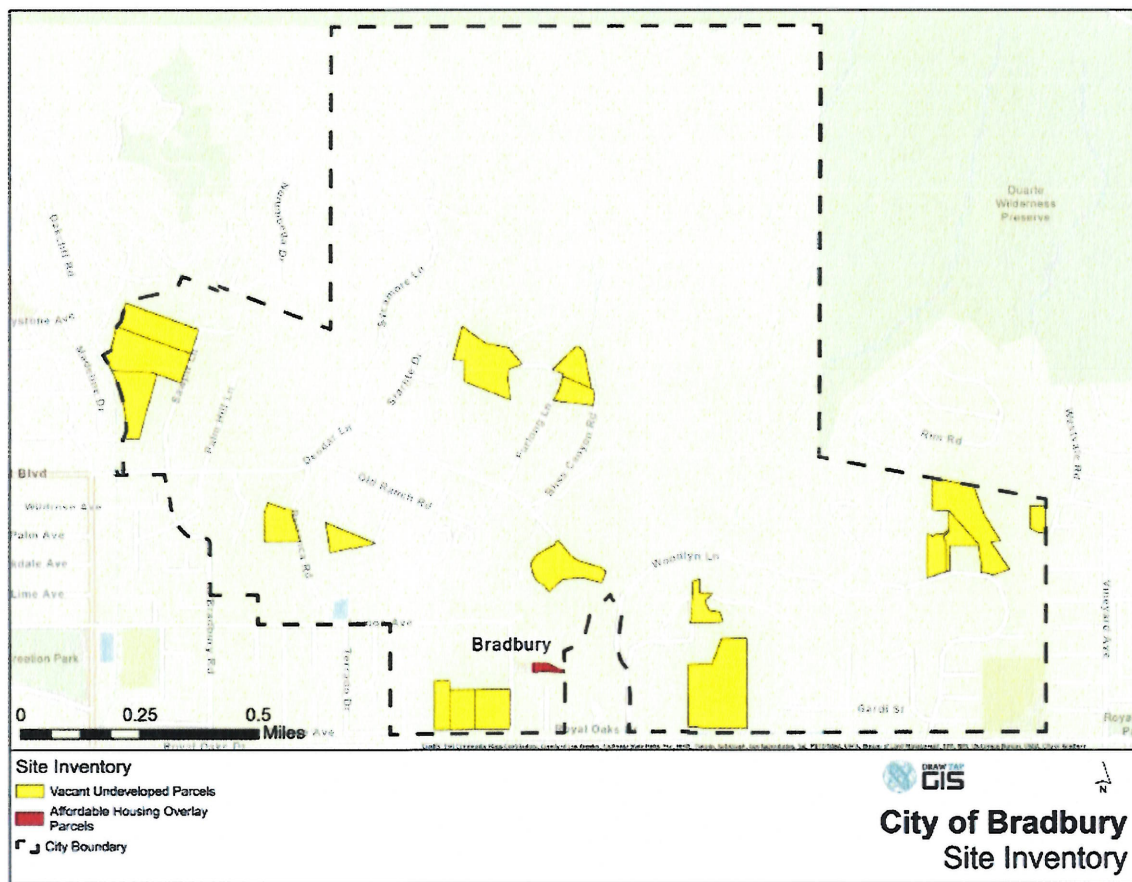
Table IV- 13: Summary of Development Potential

	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	Progress and Evaluation	Continued Appropriateness
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	The Housing Element includes an expanded fair housing program to comply with the new Affirmatively Furthering Fair Housing requirements.
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	Progress and Evaluation	Continued Appropriateness
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>	Second units have been encouraged throughout the community, and the Development Code (9.85, Secondary Living Quarters & Ord. 373 and 383) 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. The City has not yet revised the Building 101 handout to include ADUs.	<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	<i>Completion of Zoning Code Section 9.85.040 by 2019 Update 2009 Accessory Dwelling Unit Survey by 2020.</i>	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 and updated in July 2022.	<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>	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. 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://cms7/files.revize.com/bradburyca/Document_center/Serv	<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/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	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.	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	Amend the Land Use Map to designate the City Hall site with the Affordable Housing Overlay.	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	Amend the Development Code to regulate transitional housing and supportive housing as permitted residential uses in all residential zoning districts.	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 to 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	Progress and Evaluation	Continued Appropriateness
		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.

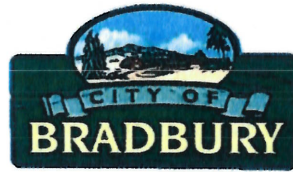
The Bradbury Development Code allows several accessory living quarter types that are suitable for farmworkers employed in the community. These include SRO units, SRO developments, bunk houses, ADUs, and JADUs. The City recently amended the Development Code to consolidate bunk houses with SRO developments. 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 by right without discretionary action and the site must be adequate to permit at least 16 units on site as residential-only use. By July 2023, amend the Zoning Map to apply the Affordable Housing Overlay (AHO) on the City Hall site to allow at least 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 38 SRO/ADU/JADU units over eight years.
- Create 18 affordable units in AHO 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. A-5 can continue to accommodate up to 10 SRO 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.) The City will pursue funding to facilitate SRO development, conduct proactive outreach for the new development parameters, encourage affirmative marketing, and develop incentives to include affordable units, among other strategies such as shared housing opportunities.

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 38 SRO/ADU/JADU units over the Housing Element planning period by promoting the new SRO and ADU/JADU 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. 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.
- Facilitate affordable and multi-family housing using other tools available: Proactive annual outreach to affordable housing developers. 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 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 within one year. 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.) The City will establish development standards that are appropriate to facilitate at least one emergency shelter.

- 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.

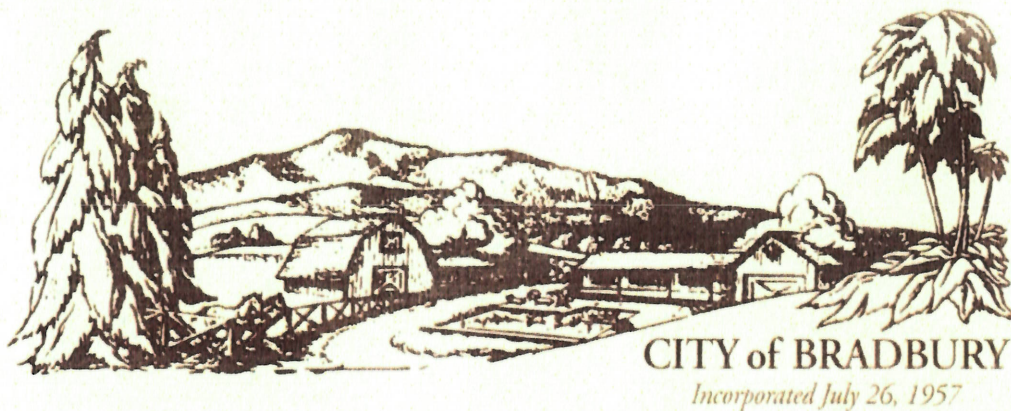
During the various public meetings, the public has expressed concerns regarding the City’s ability to accommodate additional housing given its unique characteristics. In response to these concerns while addressing Housing Element requirements, the City is proposing to revise the provisions for SRO housing (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. The Draft was submitted to HCD for review on June 15, 2022.

A Revised Draft Housing Element was prepared to respond to HCD's comments (received September 1, 2022). A 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 August 15, 2023 and sent to HCD on August 22, 2023. Pursuant to SB 1087, the City will provide the adopted Housing Element to its water and sewer service providers.

In advance of the Housing Element adoption, the City conducted additional outreach to stakeholders by directly emailing or mailing agencies and organizations that are involved in affordable housing development or serve the housing needs of lower income and special needs households, inviting input on the Bradbury Housing Element.

Figure A- 1: Notice of Preparation of the 2021-2029 Housing Element (April 7, 2021)

April 7, 2021

SUBJECT: Notification of preparation of the City of Bradbury 2021-2029 Housing Element

Hello,

The City of Bradbury has begun the process of preparing the Housing Element for the 2021-2029 Planning Period and would like your participation. There will be an introductory presentation at the April 20, 2021 City Council meeting, which begins at 7:00 p.m., and will be conducted remotely via Zoom. The presentation will cover the basics of the 2021-2029 Housing Element requirements and the housing needs that the updated Housing Element is to address.

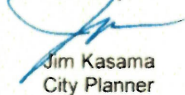
The City of Bradbury is requesting input for the 2021-2029 Housing Element. Questions and information can be submitted to the City's Planning Department at Bradbury City Hall, 600 Winston Avenue, Bradbury, CA 91008; or by email to jkasama@cityofbradbury.org.

Information for the April 20, 2021 City Council Zoom meeting, and the current Housing Element can be found on the City's website at <https://cityofbradbury.org/city-services/planning-department/housing-element>.

Public hearings will be held later this year by the Planning Commission and City Council to review a draft of the 2021-2019 Housing Element. Notices of these hearings will be sent to you.

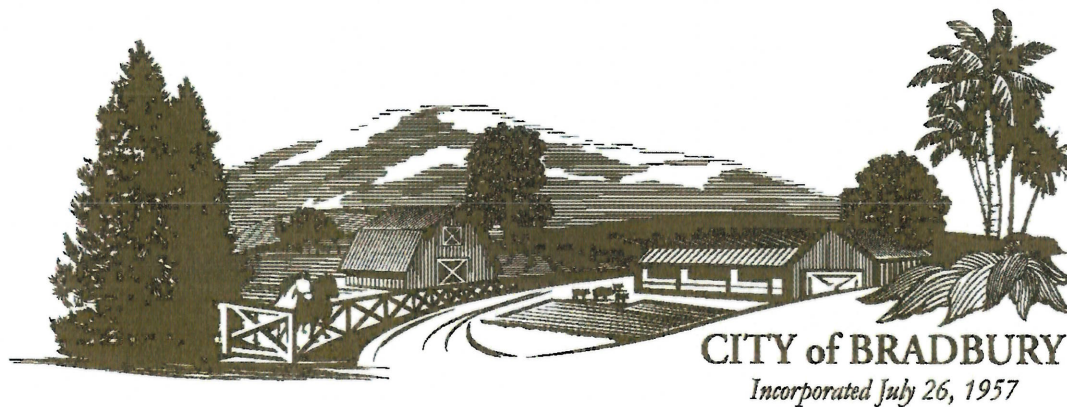
Thank you for your attention to this matter.

Sincerely,


Jim Kasama
City Planner

600 Winston Avenue • Bradbury, California 91008 • (626) 458-3218 • (626) 303-5154 Fax

Figure A- 2: Notice of Public Review Period for the Draft Housing Element (April 29, 2022)

**Elected Officials**

Mayor
Elizabeth Bruns, 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 Saldaña

Management Analyst
Sophia Musa

City Attorney
Cary Reisman

Building Inspector
Mark Handler

City Engineer
David Githerson

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:

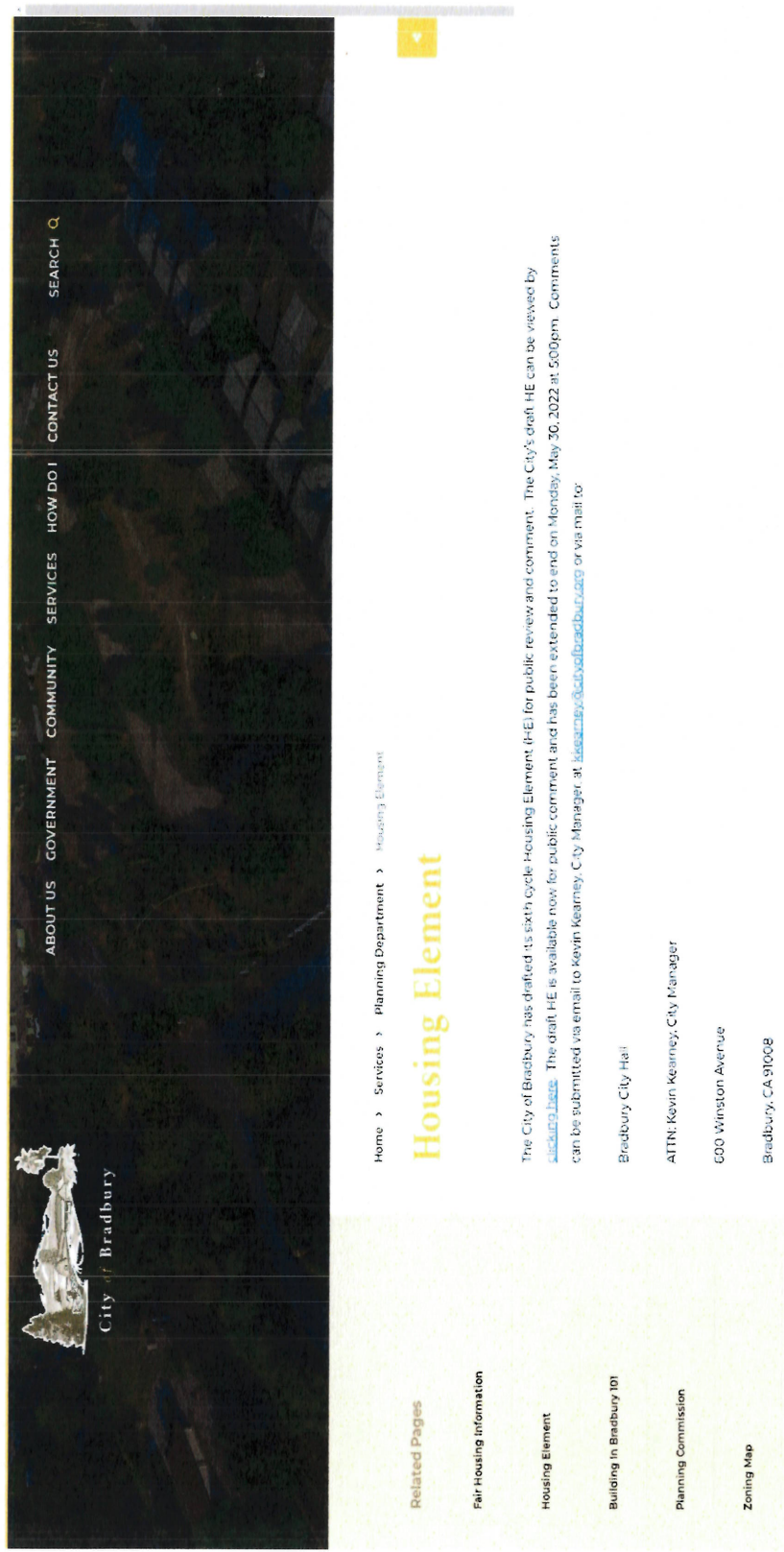
Bradbury City Hall
ATTN: Kevin Kearney, City Manager
600 Winston Avenue
Bradbury, CA 91008

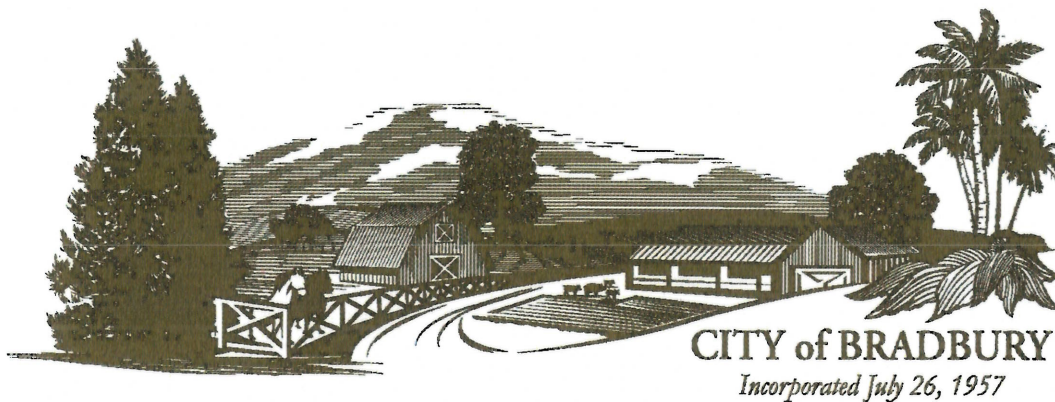
For additional information and/or questions, please contact Jim Kasama by phone at (626) 358-3218 or by email at jkasama@cityofbradbury.org

Sincerely,

Kevin Kearney
City Manager

Figure A-3: Draft Housing Element Availability in City’s Website





Elected Officials

Mayor
Richard G. Barakat, District 3

Mayor Pro-Tem
Richard T. Hale, Jr., District 1

Councilmember
D. Montgomery Lewis, District 2

Councilmember
Bruce Lathrop, District 4

Councilmember
Elizabeth Bruny, District 5

Staff

City Manager
Kevin Kearney

City Clerk
Diane Jensen

Management Analyst
Mario Flores

City Attorney
Cary Reisman

Building Inspector
Mark Handler

City Engineer
David Gåbertson

City Planner
Jim Kasama

Finance Director
Suresh Malkani

To whom it may concern:

The City of Bradbury has recently made changes to its Housing Element in response to comments received from HCD. We invite you review the Housing Element, especially Chapter VI which contains the City's programs. The City Council will be holding a hearing on the adoption of this sometime in the beginning of November and you will receive additional notice of this hearing. The revised Housing Element can be found on the City of Bradbury's website: https://www.cityofbradbury.org/services/planning_department/housing_element.php

Please feel free to contact me with any comments or questions at (626) 358-3218 or via email at kkearney@cityofbradbury.org.

Sincerely,

Kevin Kearney
City Manager

600 Winston Avenue, Bradbury, CA 91008 • 626.358.3218 • fax 626.303.5154

Figure A- 4: Stakeholder List

San Gabriel Valley Habitat for Humanity
724 E. Huntington Drive
Monrovia, CA 91016
(626) 387-8899

Southern California Presbyterian Homes
516 Burchett Street
Glendale, CA 91203
John H. Cochran

Abode Communities
1149 S. Hill Street, Suite 700
Los Angeles, CA 90015
Megan Folland
mfolland@adobe-communities.org
(213) 629-2702

Mercy Housing
1500 S. Grand Avenue, Suite 100
Los Angeles, CA 90015
(213) 743-5820

National CORE
Hope Through Housing Foundation
9421 Haven Avenue
Rancho Cucamonga, CA 91730
(909) 442-4500
(909) 483-2444
Dixie Torres

Heritage Housing Partners
608 N. Fair Oaks Avenue, #126
Pasadena, CA 91103
Mary Anne Williams
mwilliams@heritagehousingpartners.org
(626) 403-4663

Jamboree Housing Corporation
17701 Cowan Avenue, Suite 200
Irvine, CA 92614
Tish Kelly
tkelly@jamboreehousing.com
(949) 214-2350

Santa Teresita, Inc.
816 Buena Vista Street
Duarte, CA 91010
(626) 408-7802

San Gabriel Valley/Pomona Regional Center
75 Rancho Camino Drive
Pomona, CA 91766
Linda Flores
lflores@sqprc.org
(909) 620-7722

Ability First
789 N. Fair Oaks Avenue
Pasadena, CA 91103
Keri Castaneda
kcastaneda@abilityfirst.org
(626) 396-1010

Foothill Unity Center, Inc.
790 W. Chestnut Avenue
Monrovia, CA 91016
Helen Scheuplein
helen@foothillunitycenter.org
(626) 358-3486

Union Station Homeless Services
825 E. Orange Grove Blvd.
Pasadena, CA 91104
Sylvia Khatchadourian
skhatchadourian@unionstationhs.org
(626) 798-1640

Friends In Deed
P.O. Box 41125
Pasadena, CA 91114-8125
Merria Velasco
merriav@friendsindeedpas.org
(626) 797-2402

Meals on Wheels
Volunteer Center of the San Gabriel Valley
119 W. Palm Avenue
Monrovia, CA 91016
Macy Gracia
macy@vcsqv.org
(626) 256-8187

Meals on Wheels
Duarte Senior Center
1610 Huntington Drive
Duarte, CA 91010
Susie Perez
sperez@accessduarte.com

| City Ventures
Attn: Briggs D'Eliscu
Briggs@CityVentures.com

| Matthew Gelfand
Californians for Homeownership
525 S. Virgil Avenue
Los Angeles, CA 90020
matt@calforhome.org



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

Category	Bradbury	Los Angeles County	Bradbury Relative to Los Angeles County*	SCAG Region
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.

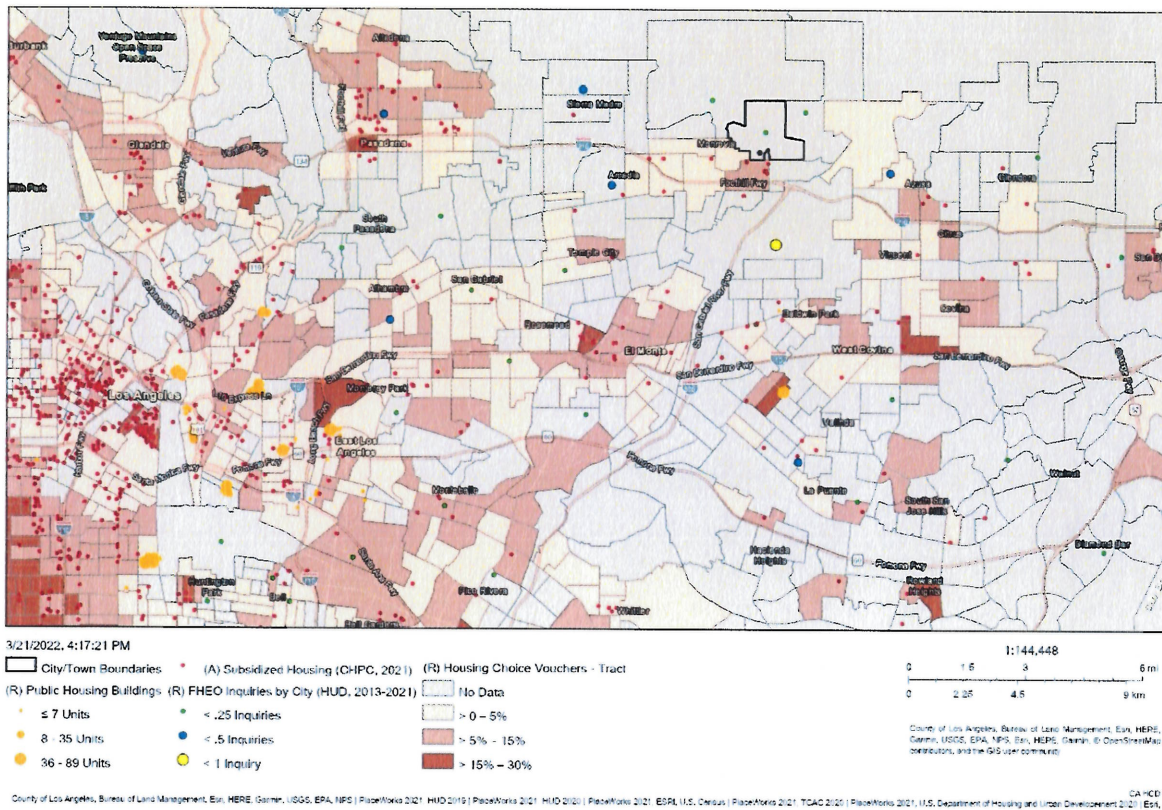
The City works to comply with applicable federal and State fair housing laws and to ensure that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status, or sex. Further, the Los Angeles County Development Authority (LACDA) prohibits discrimination 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 inquiries 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). Inquiries 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.

Legend:

- City/Town Boundaries
- (A) Subsidized Housing (CHPC, 2021)
- (R) FHEO Inquiries by City (HUD, 2013-2021)
- (R) Housing Choice Vouchers - Tract
- No Data
- > 0 – 5%
- > 5% – 15%
- < 25 Inquiries

Scale: 1:86,112
0 0.25 0.5 1 mi
0 0.4 0.8 1.6 km

County of Los Angeles, Bureau of Urban Management. Data: HUD, Census, Department of Social Services, etc. © 2022. All rights reserved.

Community Participation Process

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.

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

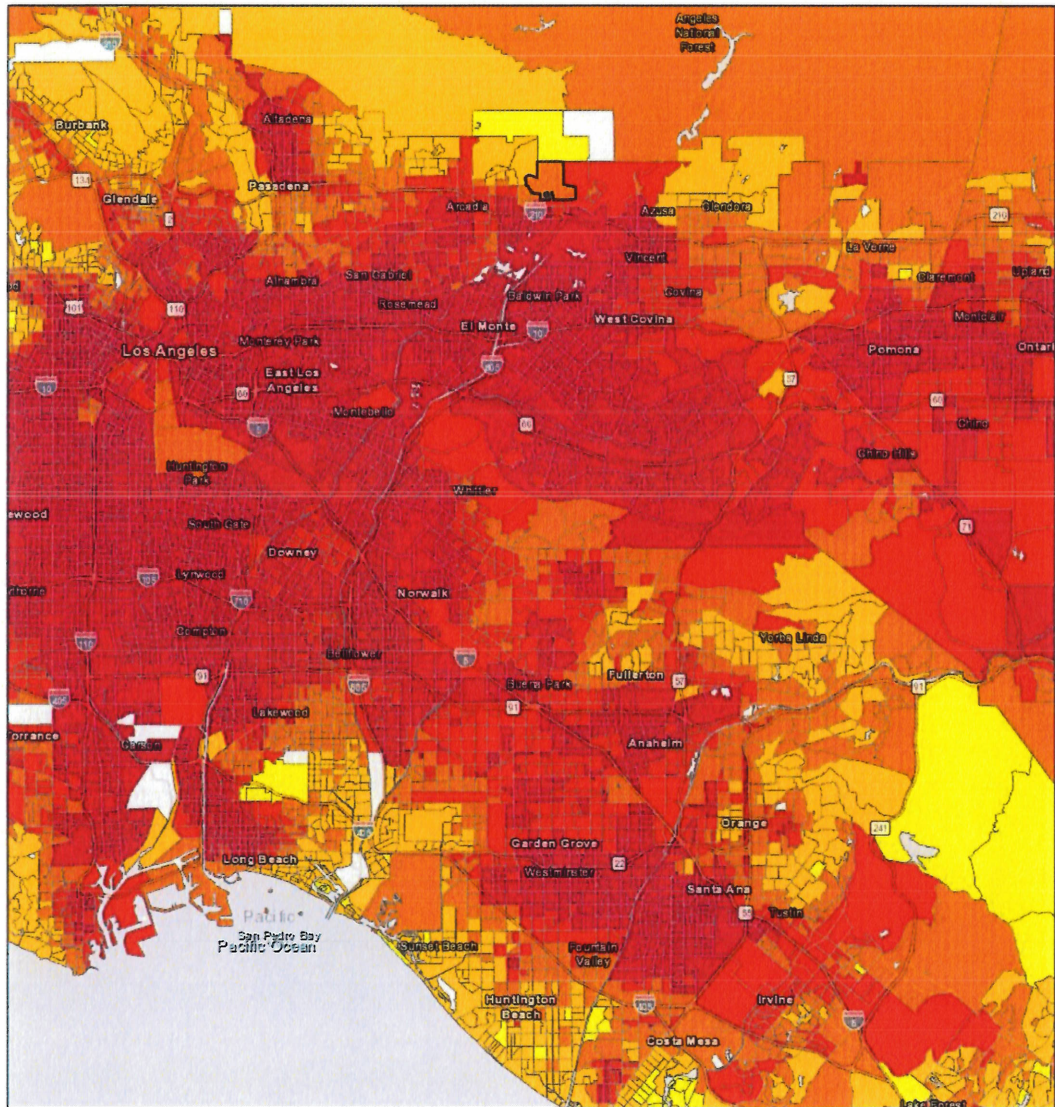
Dissimilarity indices for Los Angeles County are shown in [Table 2](#) . Dissimilarity indices between non-White and White groups indicate that the County has become increasingly segregated since 1990. Segregation between Black and White communities has decreased, while segregation between Hispanic and 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)



3/22/2022, 4:22:08 PM

City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

- ≤ 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 81%

1:288,895

0 2.75 5.5 11 mi
0 4.5 9 18 km

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 2010 | 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%

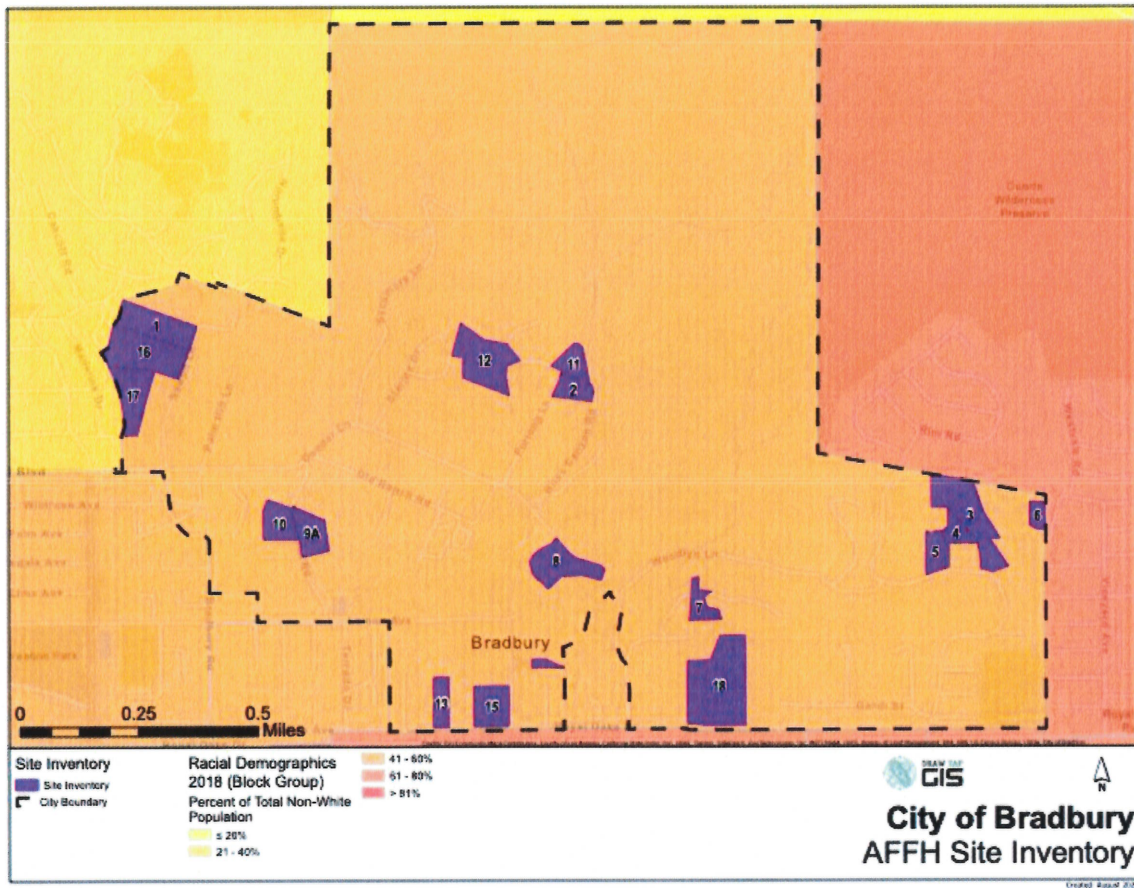
Source: 2015-2019 and 2006-2010 ACS (5-Year Estimates).

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

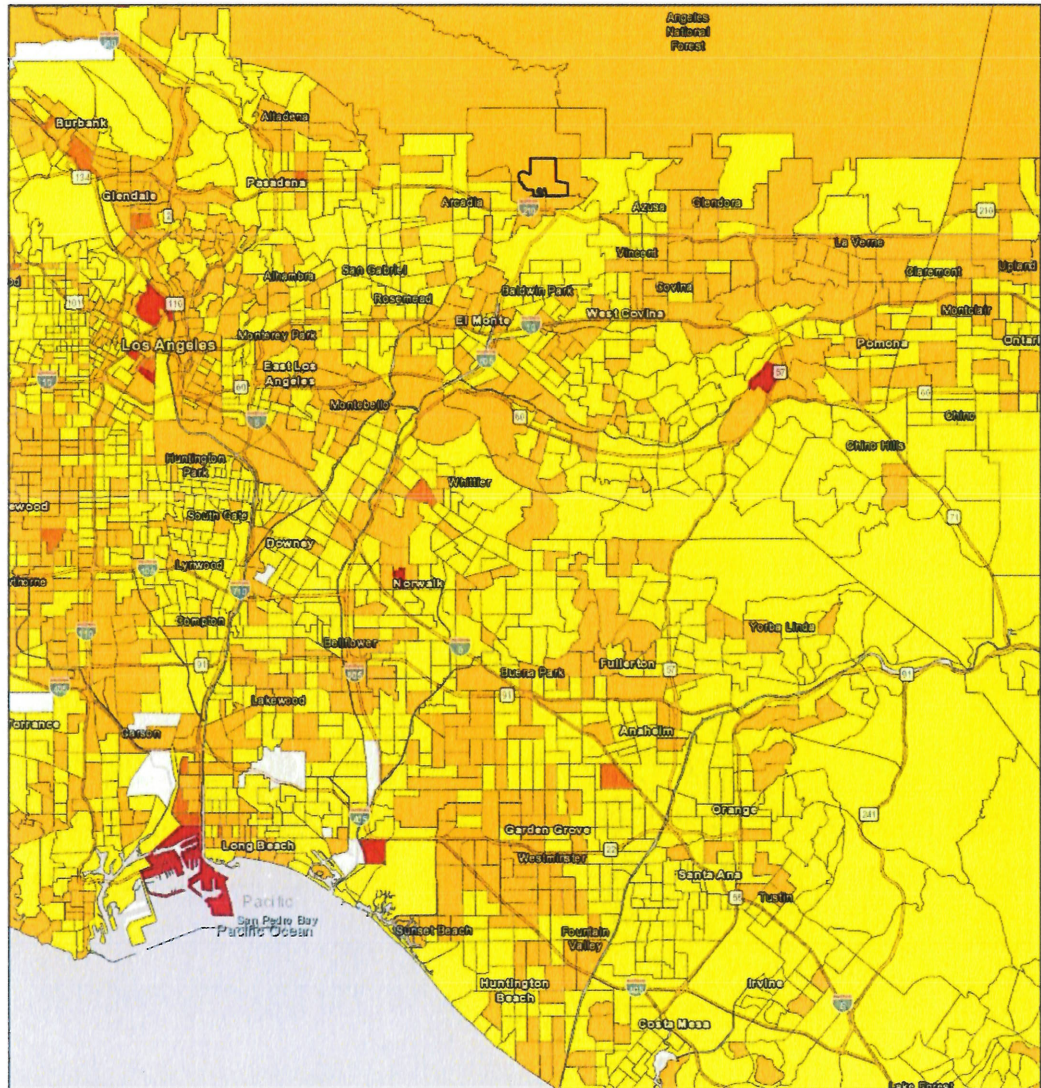
According to the 2015-2019 ACS ([Table 4](#)), 9.9 percent of Los Angeles County residents experience a disability. Bradbury has a smaller population of persons with disabilities (8.3 percent) compared to the County, and the neighboring cities of Azusa (8.4 percent), Duarte (12.9 percent), and Monrovia (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 Type¹					
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.

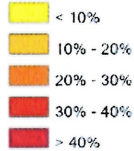
Figure 6: Regional Concentration of Persons with Disabilities (2019)



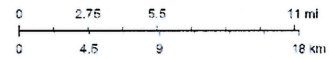
3/22/2022, 4:21:17 PM

City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract



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 2015 (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.



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

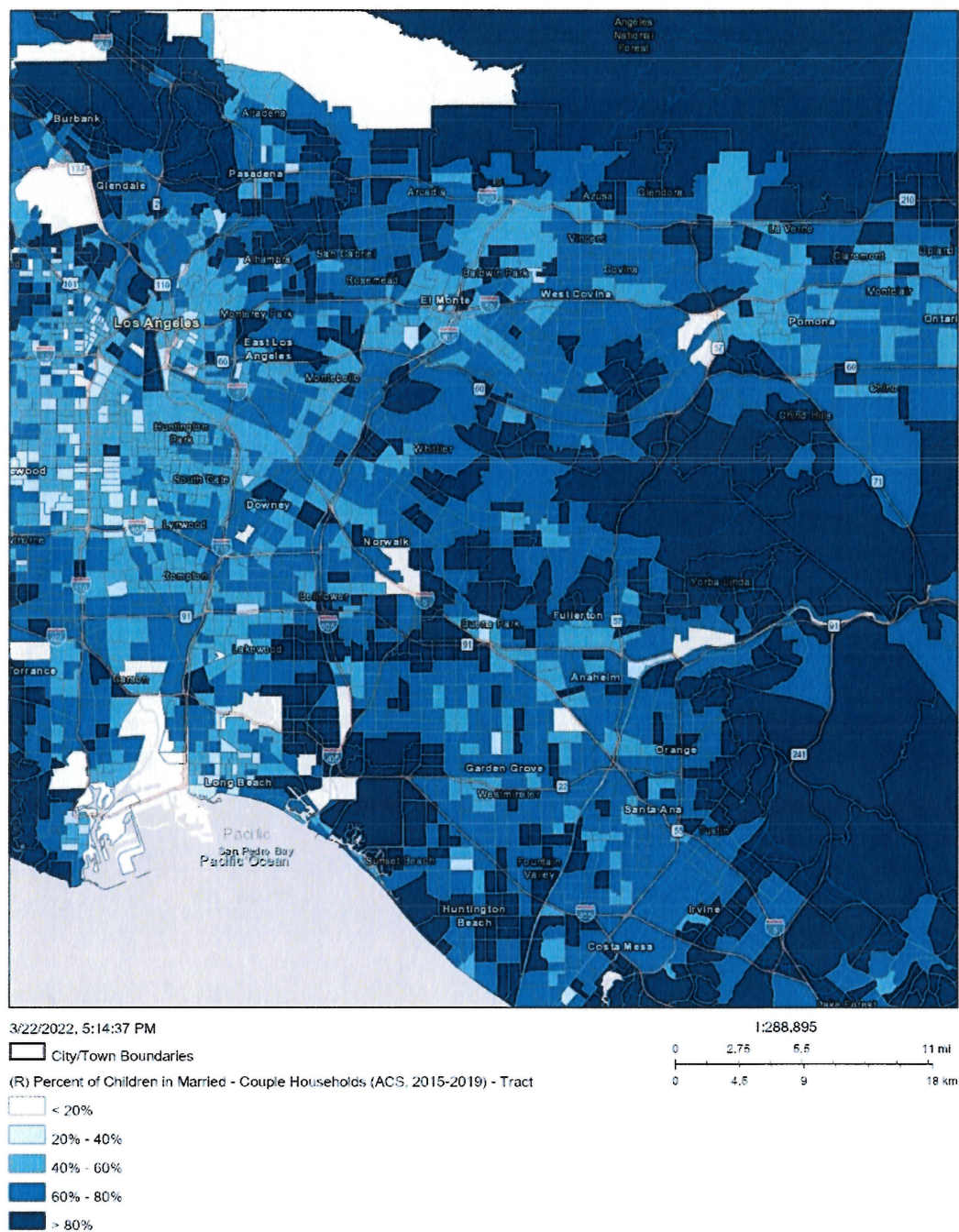
	Los Angeles County	Bradbury	Azusa	Duarte	Monrovia
HH with Children	33.0%	30.0%	37.6%	28.2%	30.7%
Married-couple HH w/children	28.3%	24.8%	32.1%	23.3%	26.5%
Cohabiting Couple HH w/ children	19.3%	18.5%	22.1%	16.0%	19.2%
Single Male HH w/ children	2.6%	0.0%	2.2%	2.5%	2.5%
Single Female HH w/children	6.4%	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)

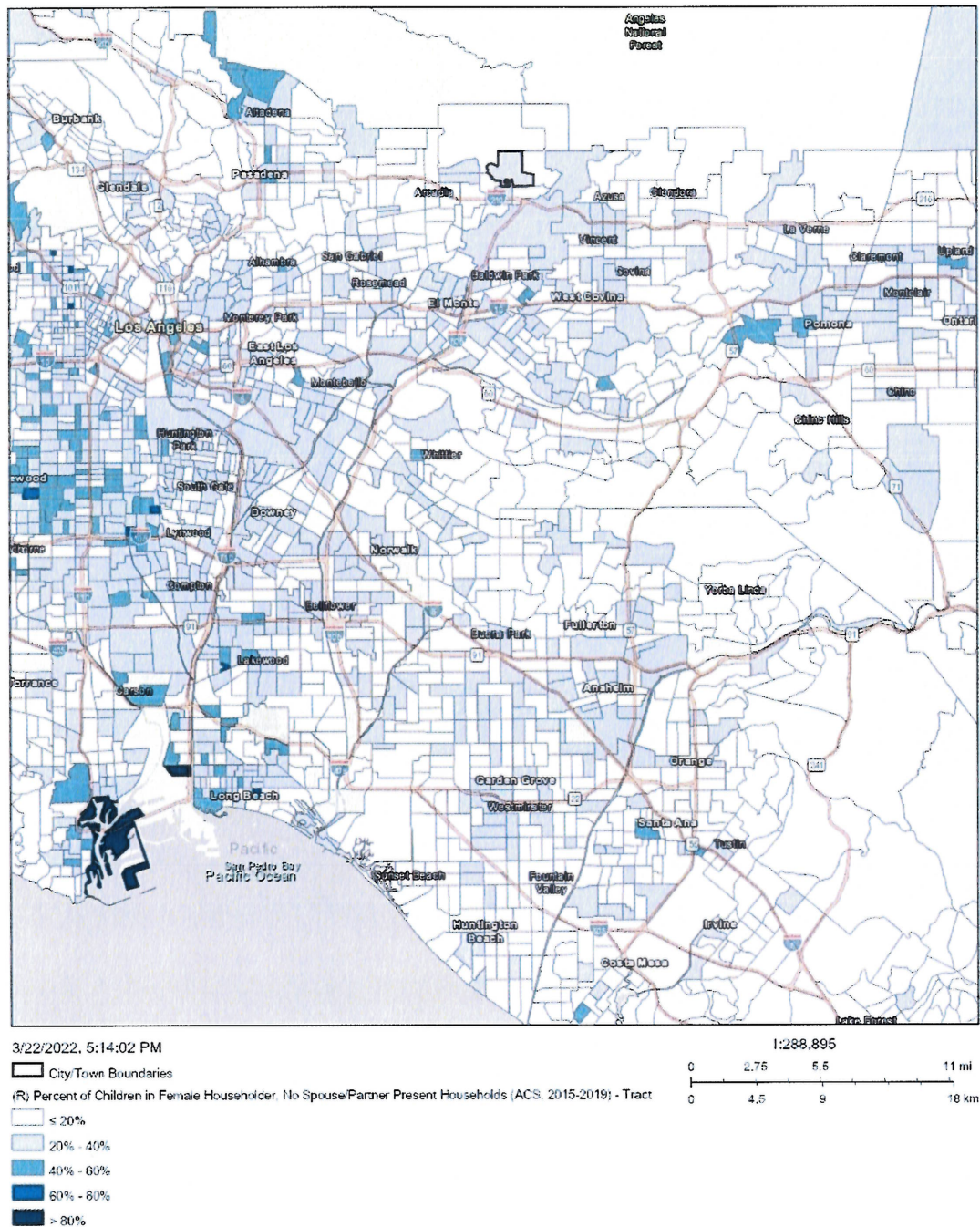


County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure 9: Regional Percent of Children in Female-Headed Households (2019)



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

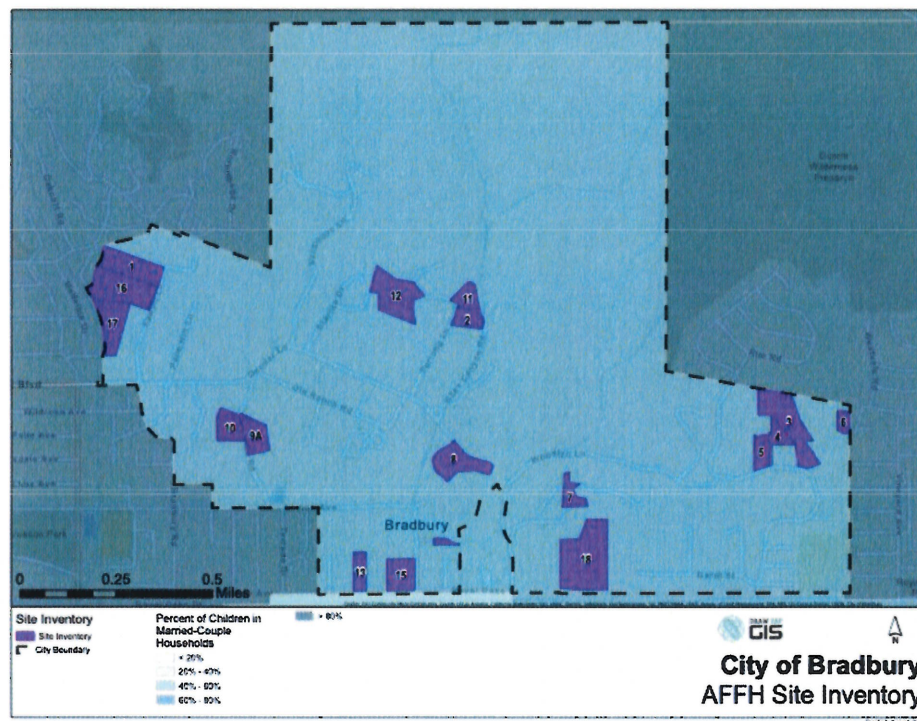
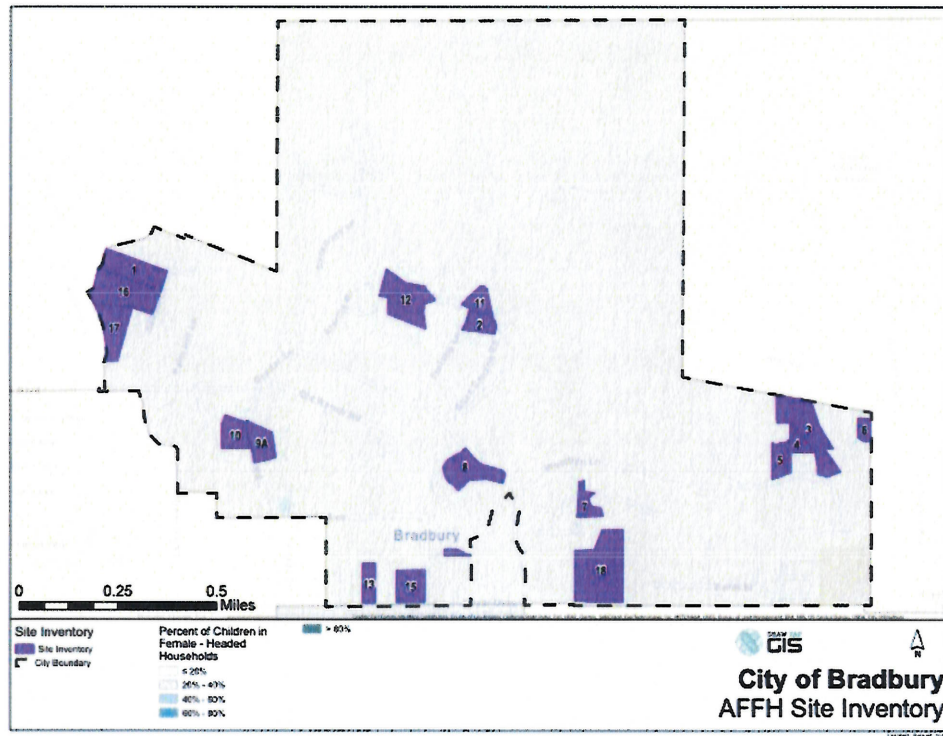


Figure 11: RHNA Units by % of Children in Single Female-Headed Households



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.

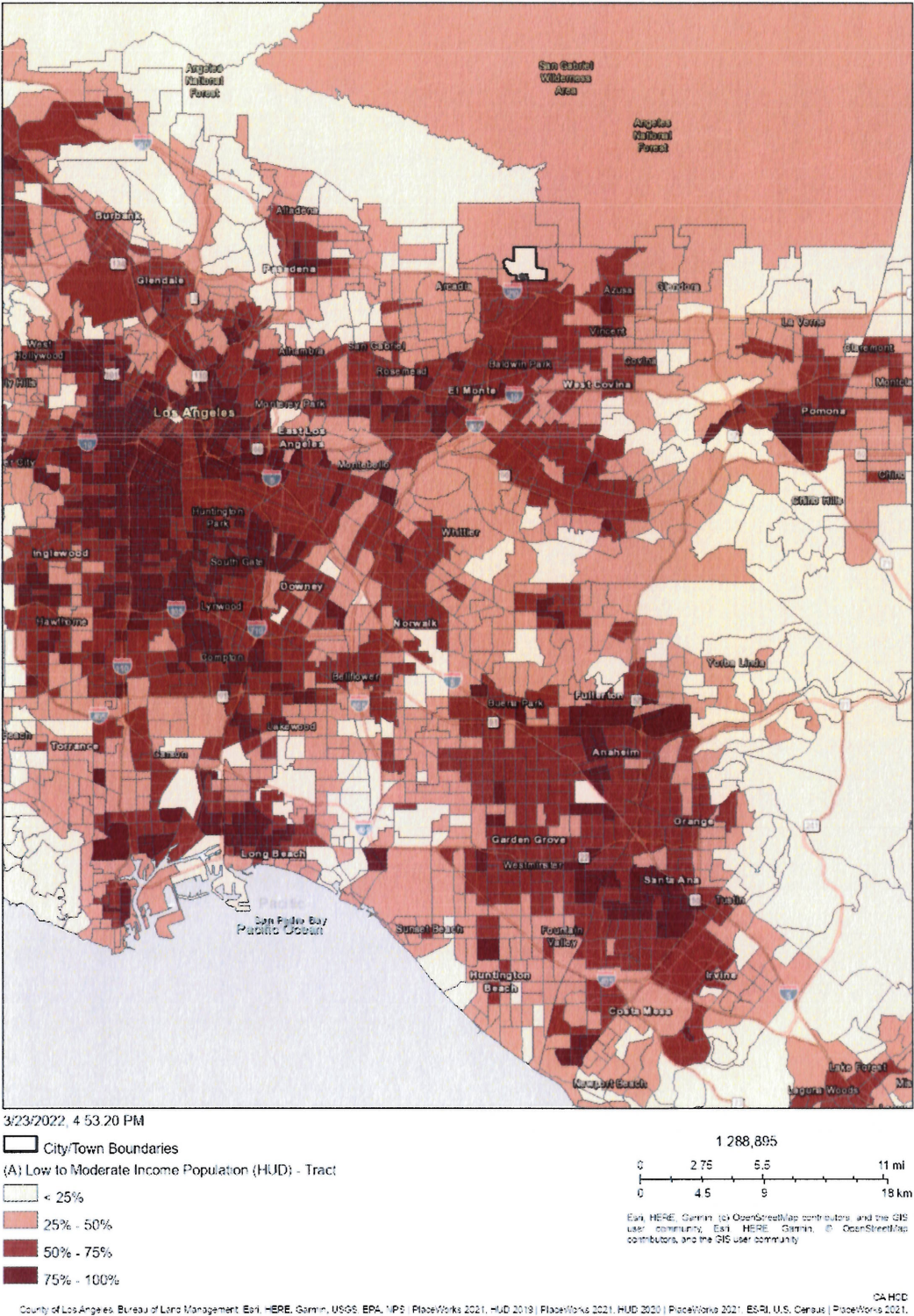
51-80% AMI	35	12.1%	570,615	17.3%
81-100% AMI	0	0.0%	316,295	9.6%
>100% AMI	220	75.9%	1,358,415	41.1%
Total	290	100.0%	3,306,110	100.0%
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data (based on 2014-2018 ACS), 2020.				

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.

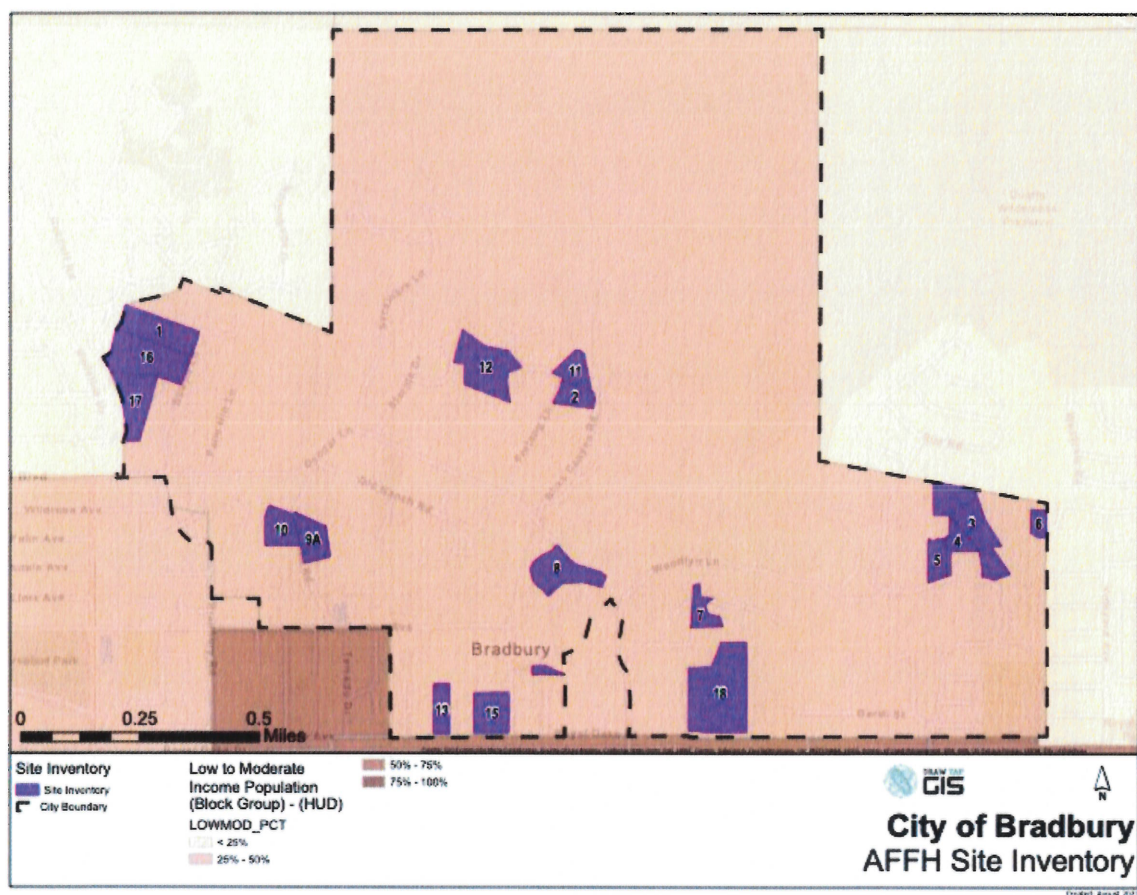
Table 9: Extremely Low and LMI Households by Race/Ethnicity

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

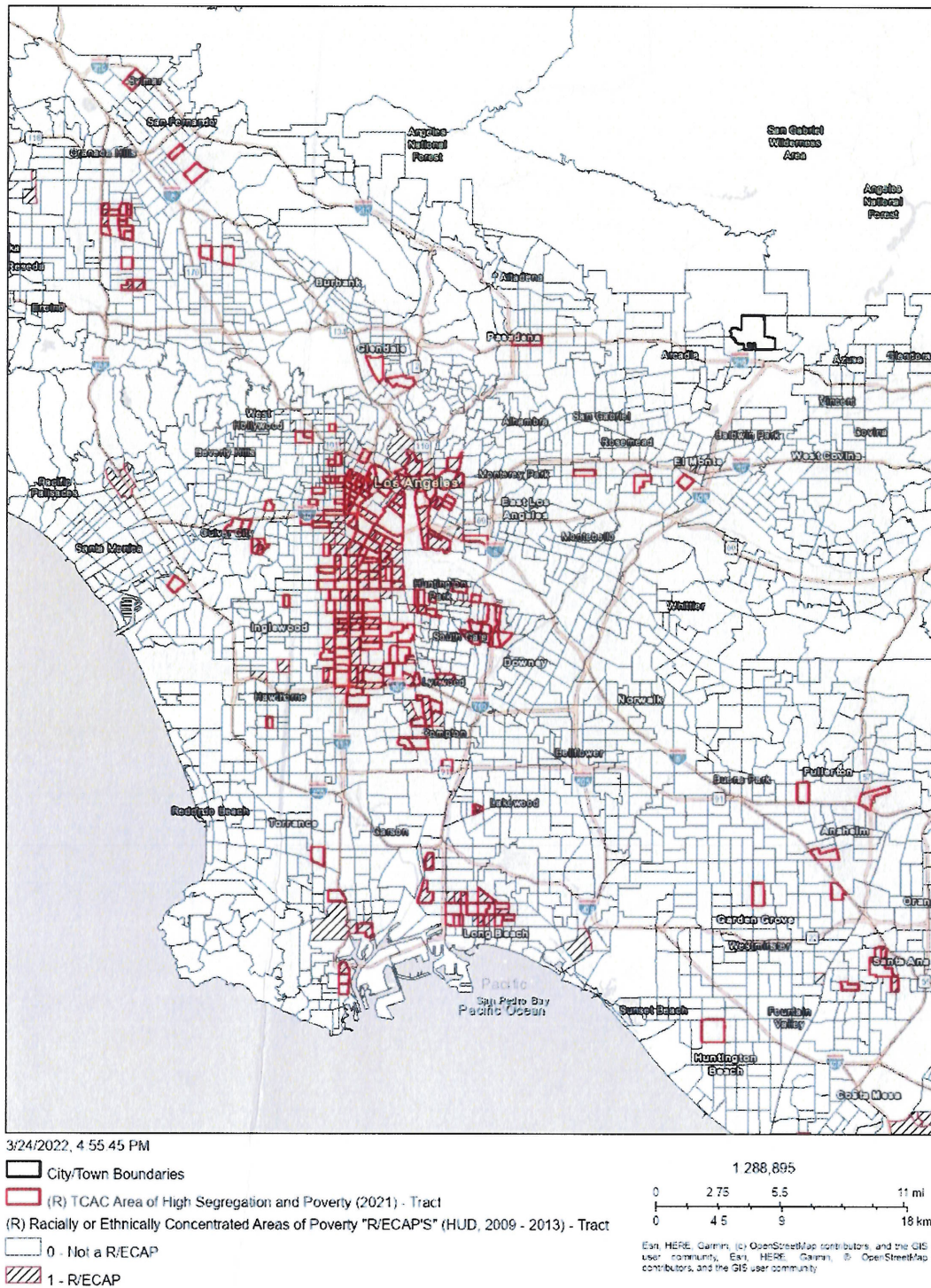
Approximately 15 percent of the County population is below the federal poverty level (Table 10). Black/African American, American Indian/Alaska Native, persons of a race not listed (“other”), and Hispanic/Latino populations all experience poverty at a higher rate than the average countywide. The proportion 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)



County of Los Angeles, Bureau of Land Management, EA: 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, HUD R/ECAP data (2009-2013 ACS) and TCAC Opportunity Maps (2021).

1

1



Racially and Ethnically Concentrated Areas of Affluence (RCAAs)

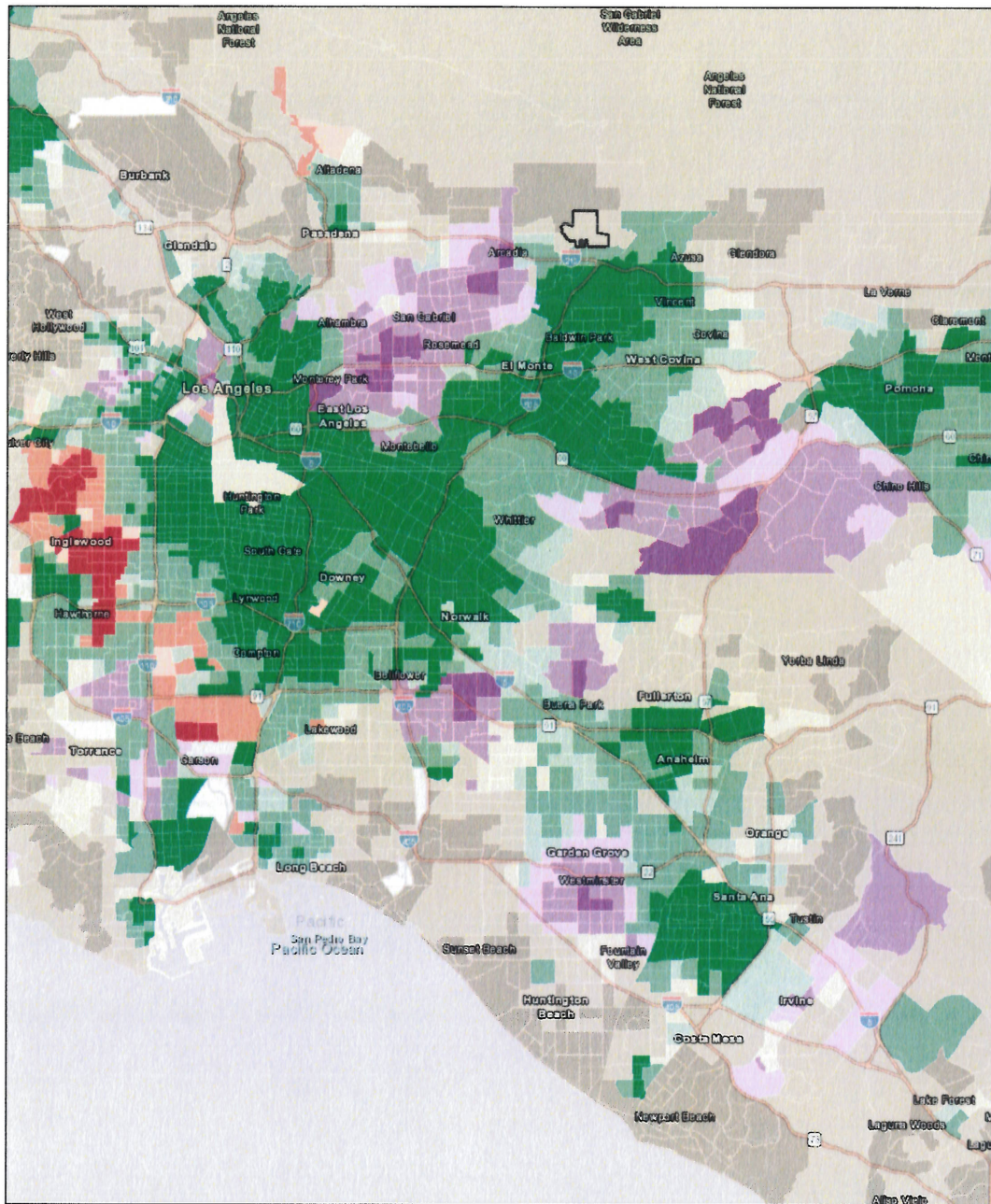
While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD Policy Paper defines racially concentrated 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



3/24/2022, 6 25 36 PM

- City/Town Boundaries
- (R) Predominant Population - White Majority Tracts
 - Small (pop < 10k)
 - Sizeable (pop 10k - 50k)
 - Predominant (pop > 50k)
- (R) Predominant Population - Hispanic Majority Tracts
 - Small (pop < 10k)
 - Sizeable (pop 10k - 50k)
 - Predominant (pop > 50k)
- (R) Predominant Population - Asian Majority Tracts
 - Small (pop < 10k)
 - Sizeable (pop 10k - 50k)
 - Predominant (pop > 50k)
- (R) Predominant Population - African American Majority Tracts
 - Small (pop < 10k)
 - Sizeable (pop 10k - 50k)
 - Predominant (pop > 50k)

1 288,895

0 2.75 5.5 11 mi

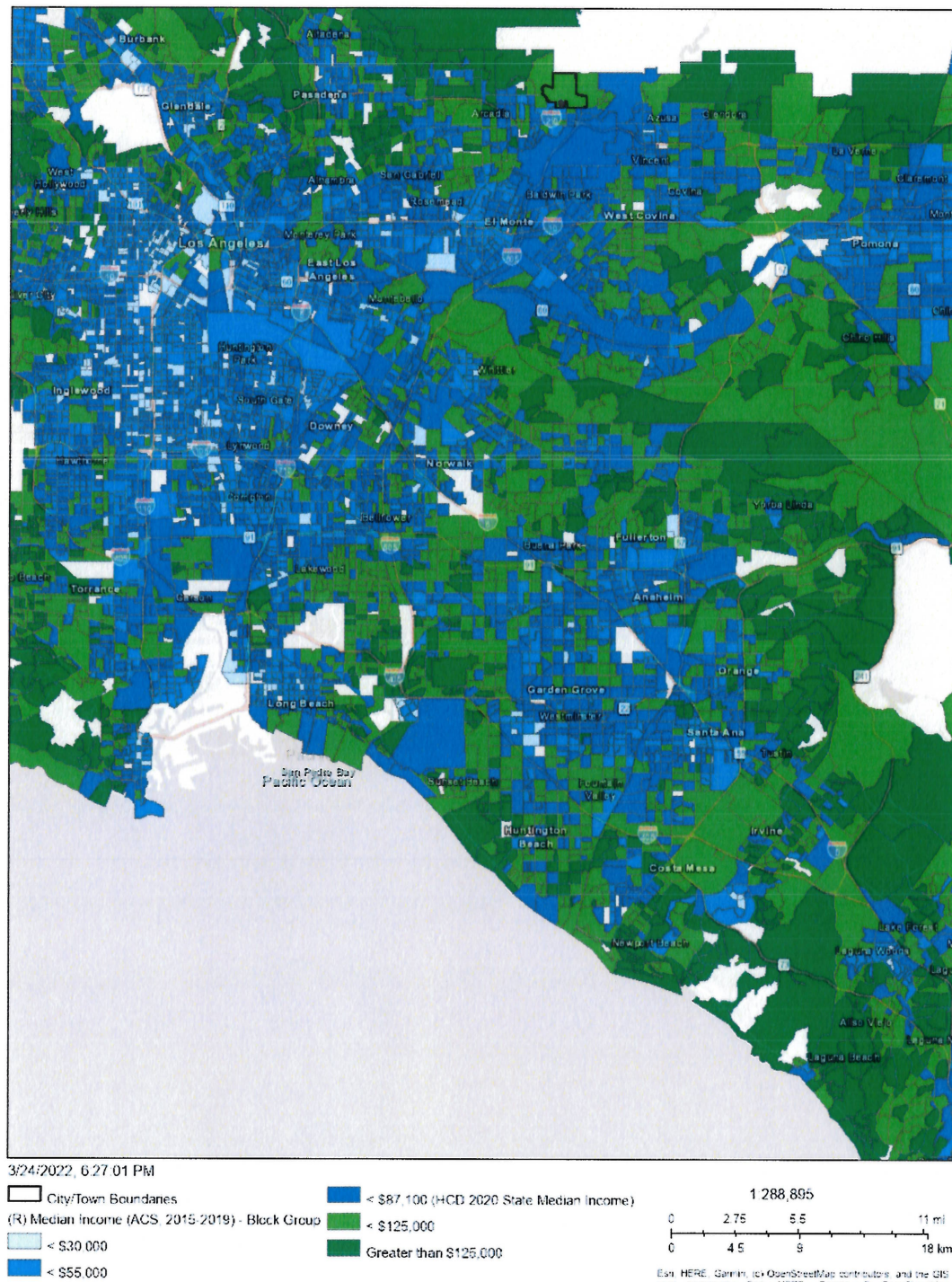
0 4.5 9 18 km

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

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, CAHCD

Source: HCD AFFH Data Viewer, 2021.

Figure 17: Regional Median Income by Block Group



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, 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.

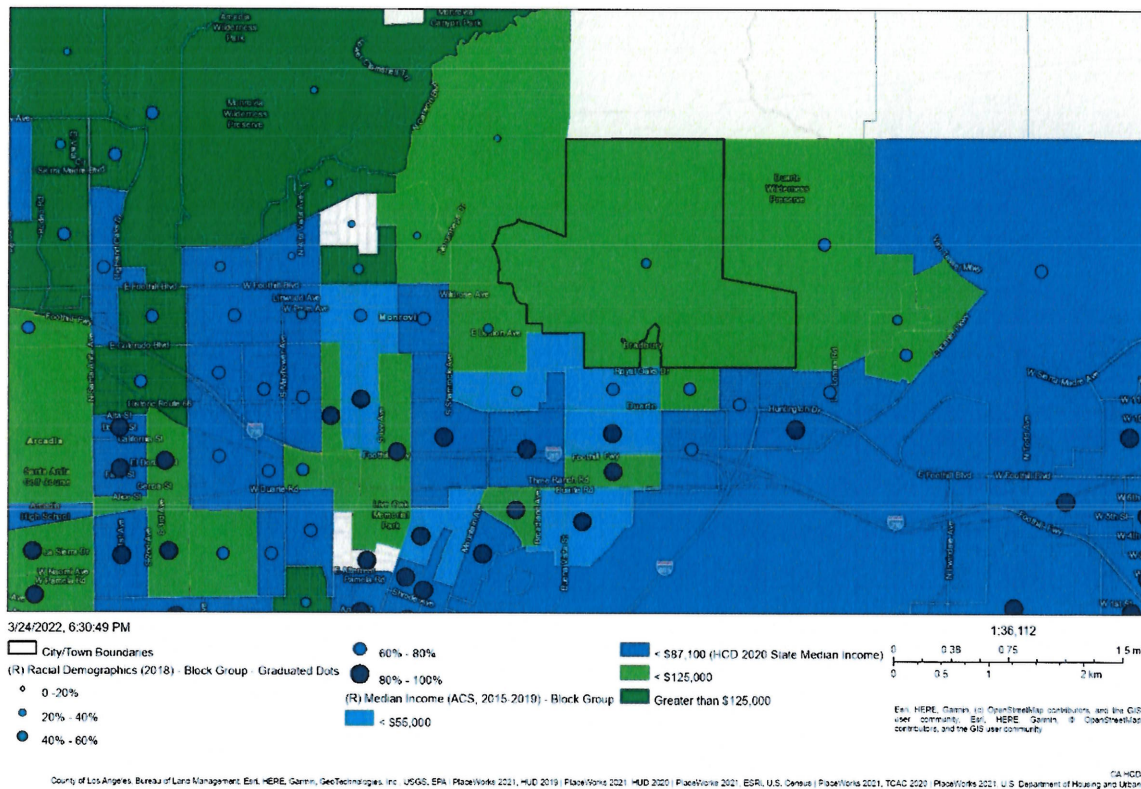
Table 11: White and Asian Median Household Income and Population

	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

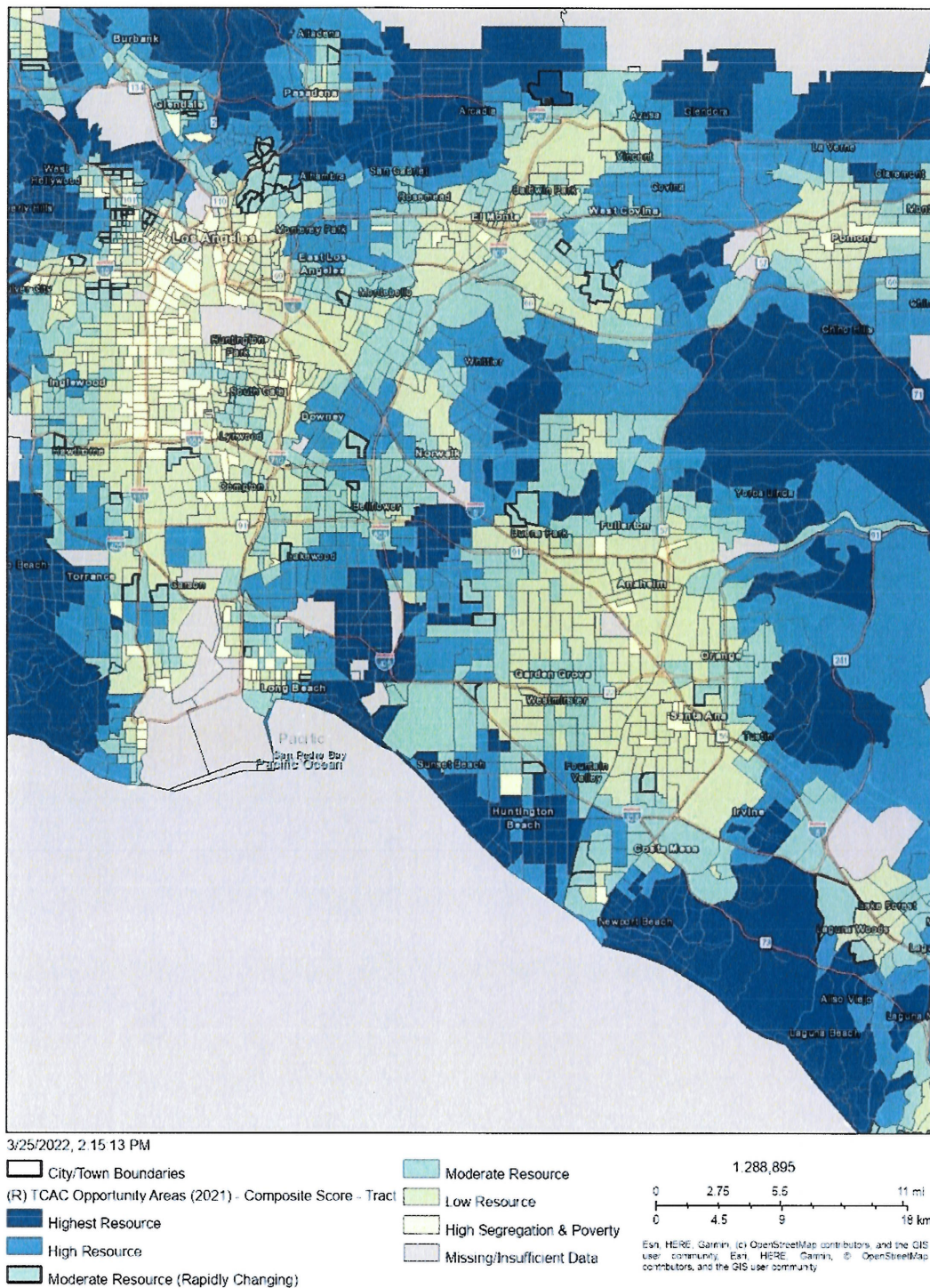
HUD Opportunity Indicator values for Los Angeles County are shown in Table 13. The White population, including the population below the federal poverty line, received the highest values in low poverty, school proficiency, labor market participation, jobs proximity, and environmental health. Hispanic 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 Proximity	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



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, 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](#)

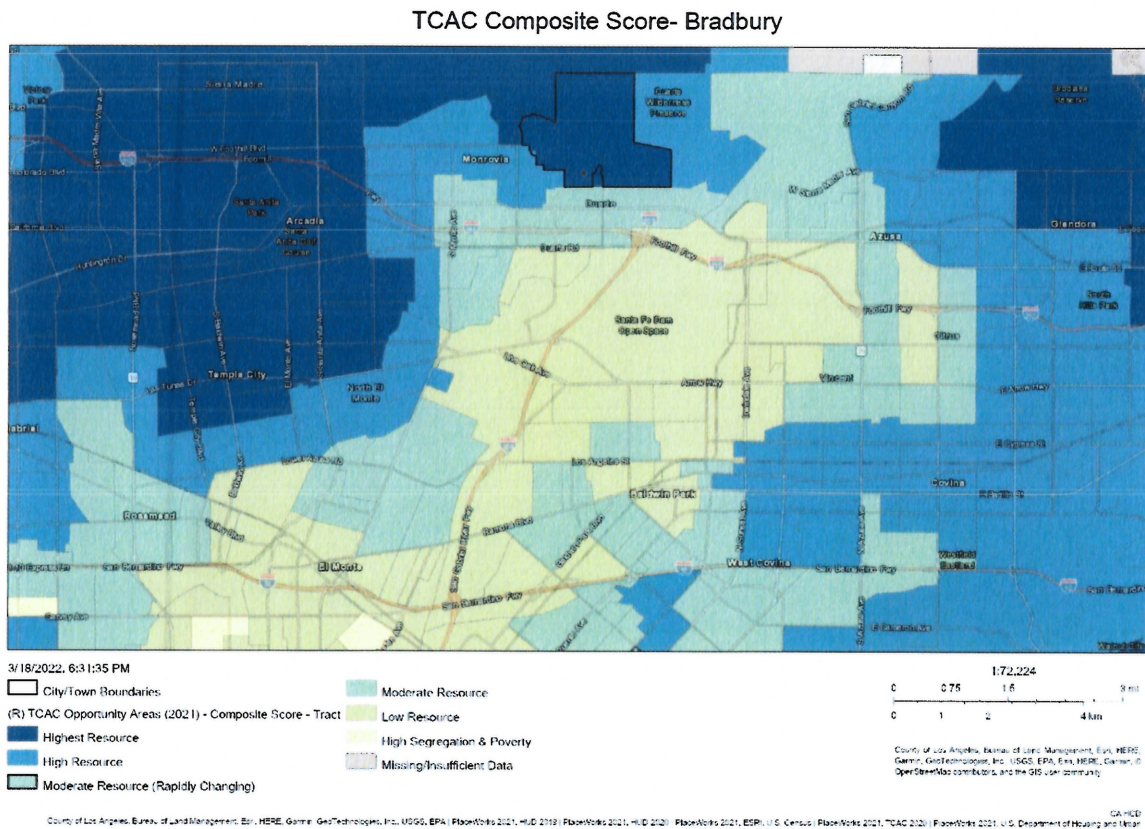
<u>Census Tract</u>	<u>Economic Domain Score</u>	<u>Environmental Domain Score</u>	<u>Education Domain Score</u>	<u>Composite Index Score</u>	<u>Final Category</u>
<u>06037430200</u>	<u>0.89</u>	<u>0.88</u>	<u>0.60</u>	<u>0.44</u>	<u>Highest Resource</u>
<u>Source: California Fair Housing Task Force, 2021 TCAC/HCD Opportunity Maps, December 2020.</u>					

. 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>
<u>Source: California Fair Housing Task Force, 2021 TCAC/HCD Opportunity Maps, December 2020.</u>					

Figure 20: Bradbury and Local TCAC Opportunity Areas- Composite Scores

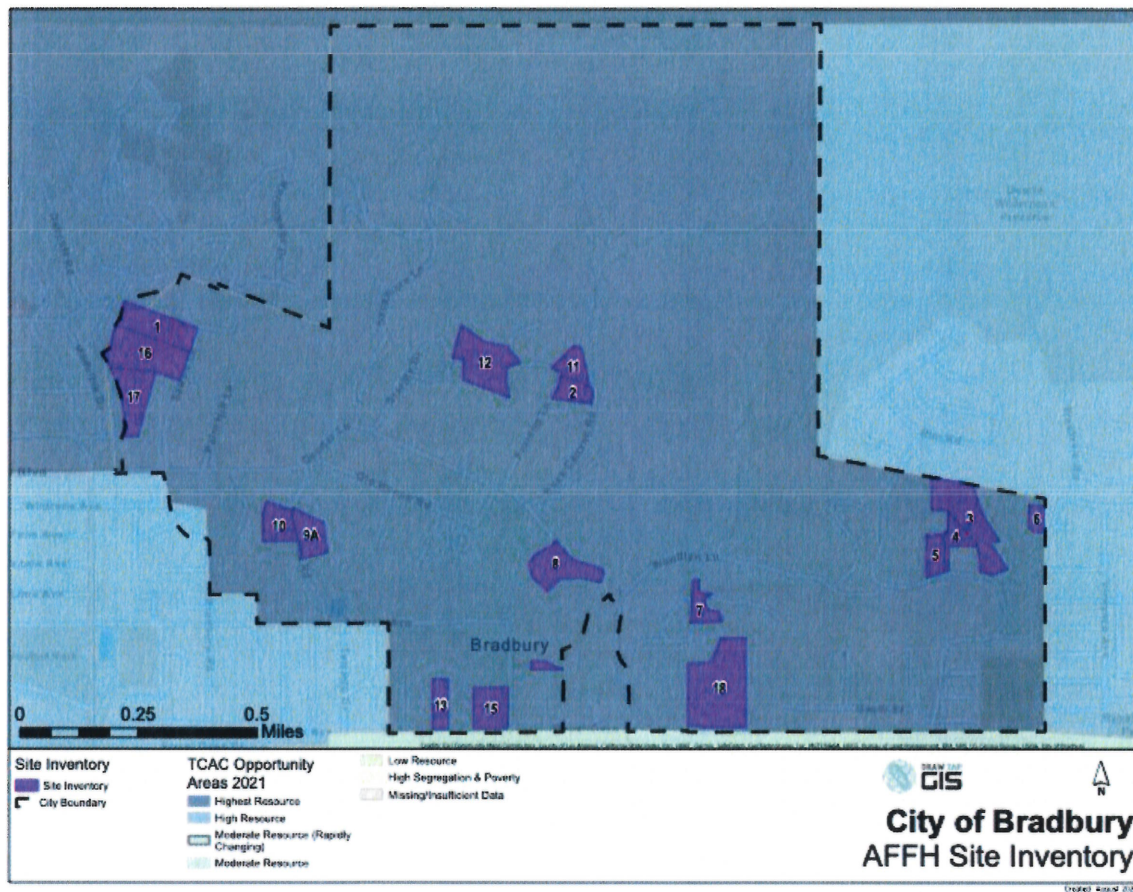


Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021

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.

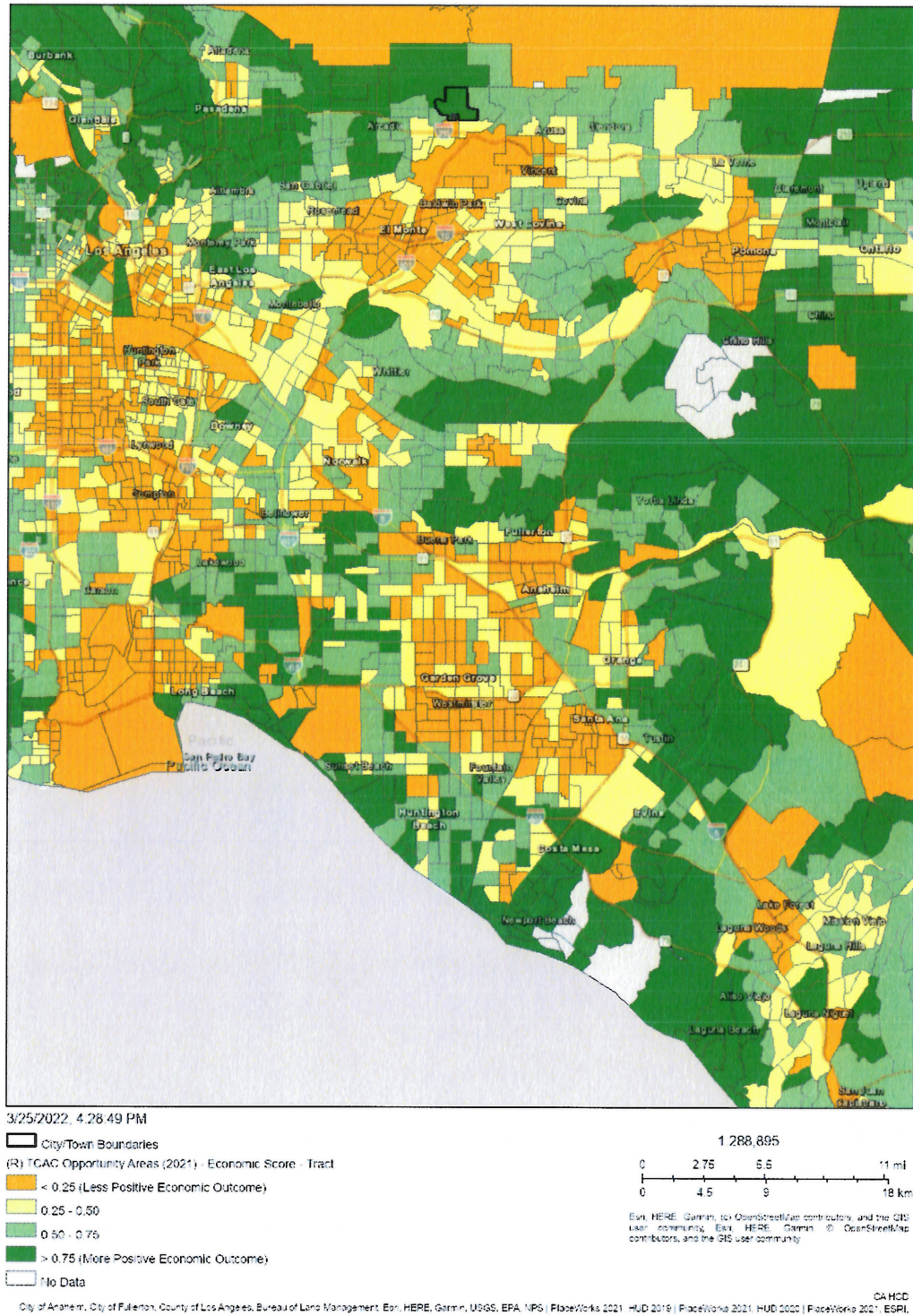
Regional Trend

[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 in 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.

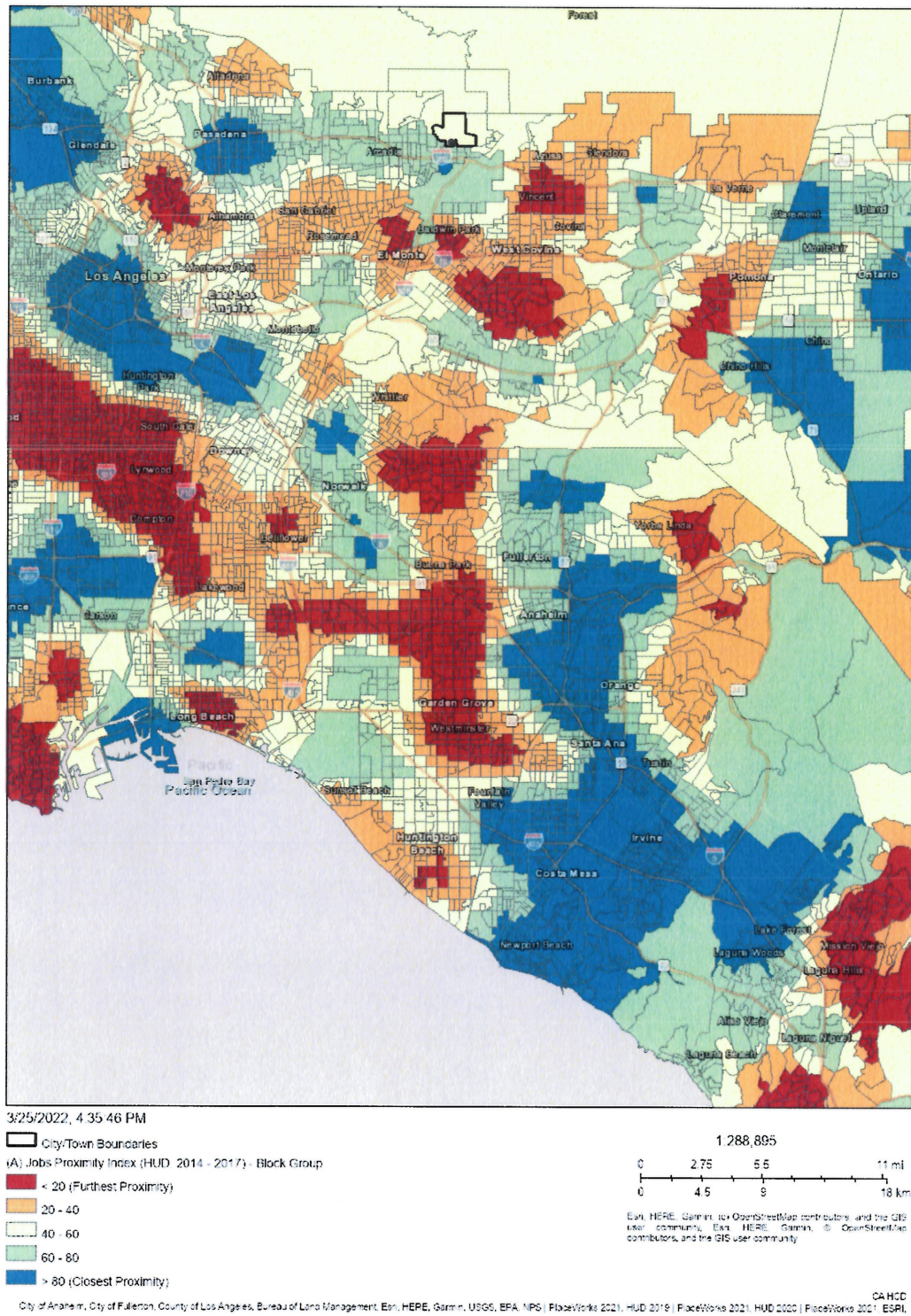
⁷ The TCAC Economic Scores are a composite of jobs proximity index values as well as poverty, adult education, employment, and median home value characteristics.

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.

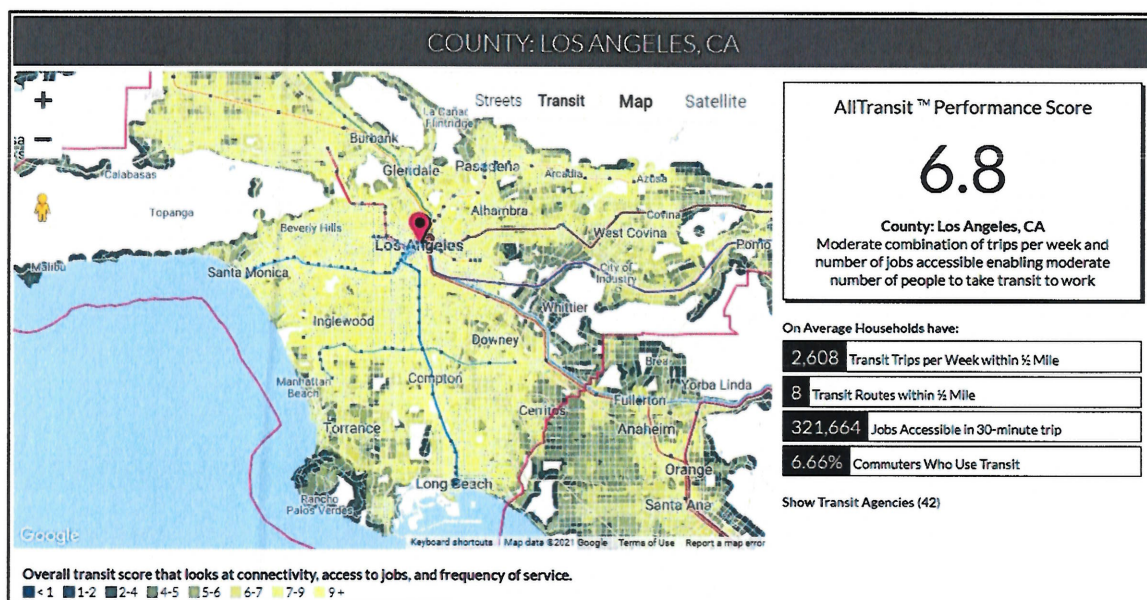
Transportation

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

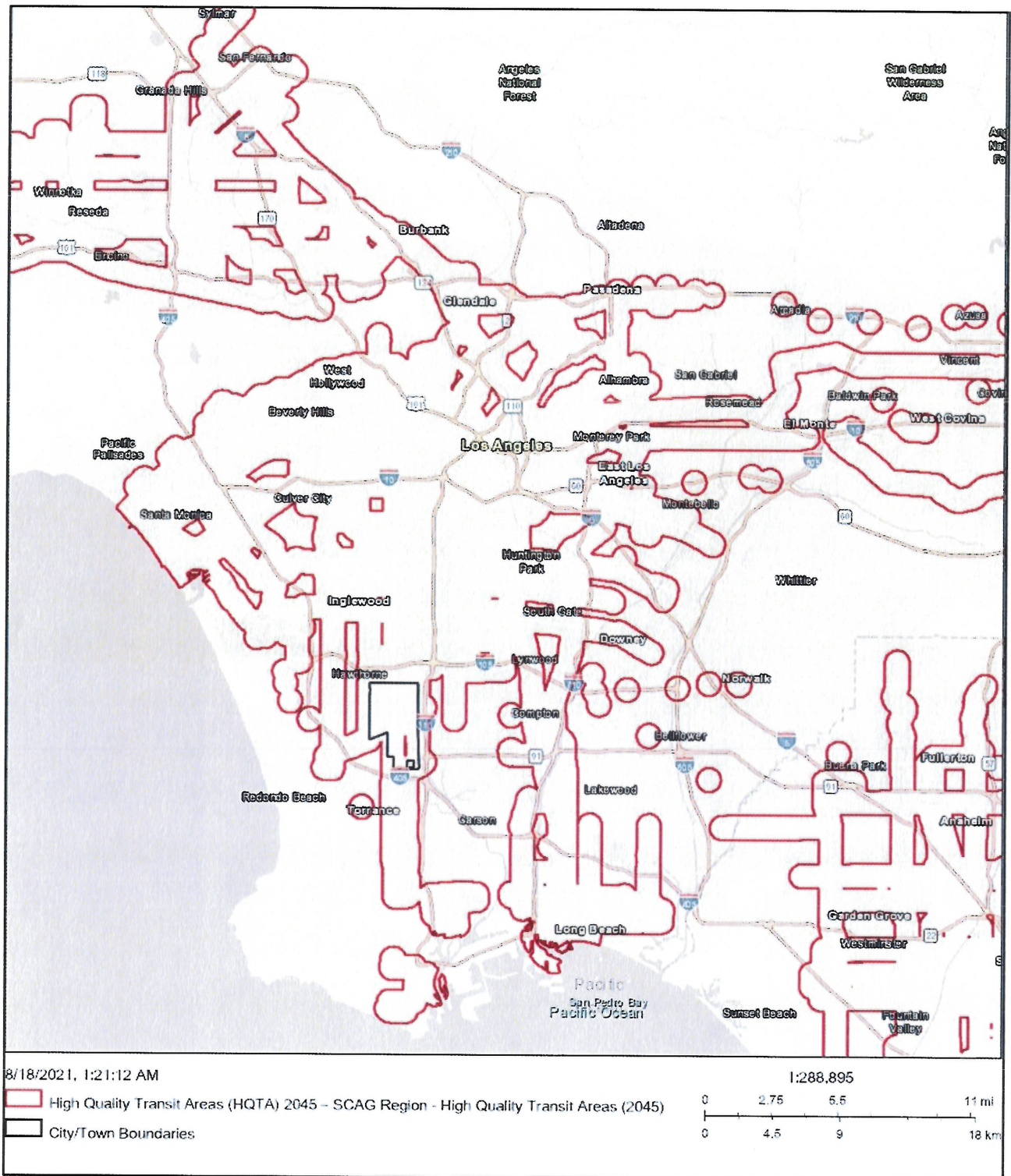


Source: All Transit Metrics: All Transit Performance Score – Los Angeles County, 2019.

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 HQTAs in the communities along the Los Angeles National Forest including Altadena, Sierra Madre, 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)

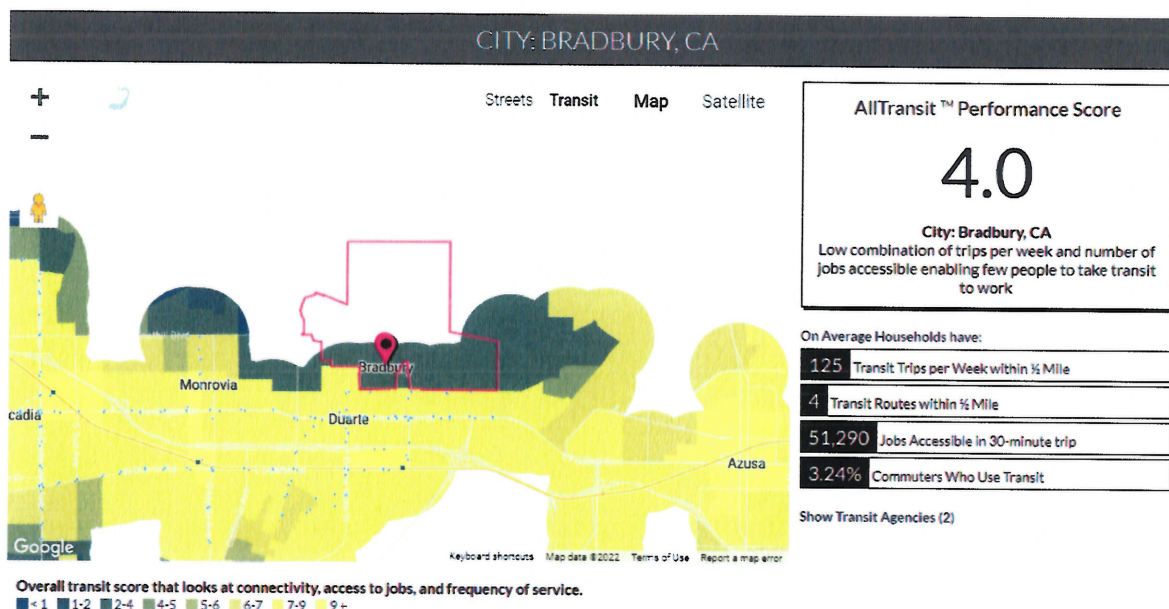


Source: SCAG HQTA database, 2021

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)		

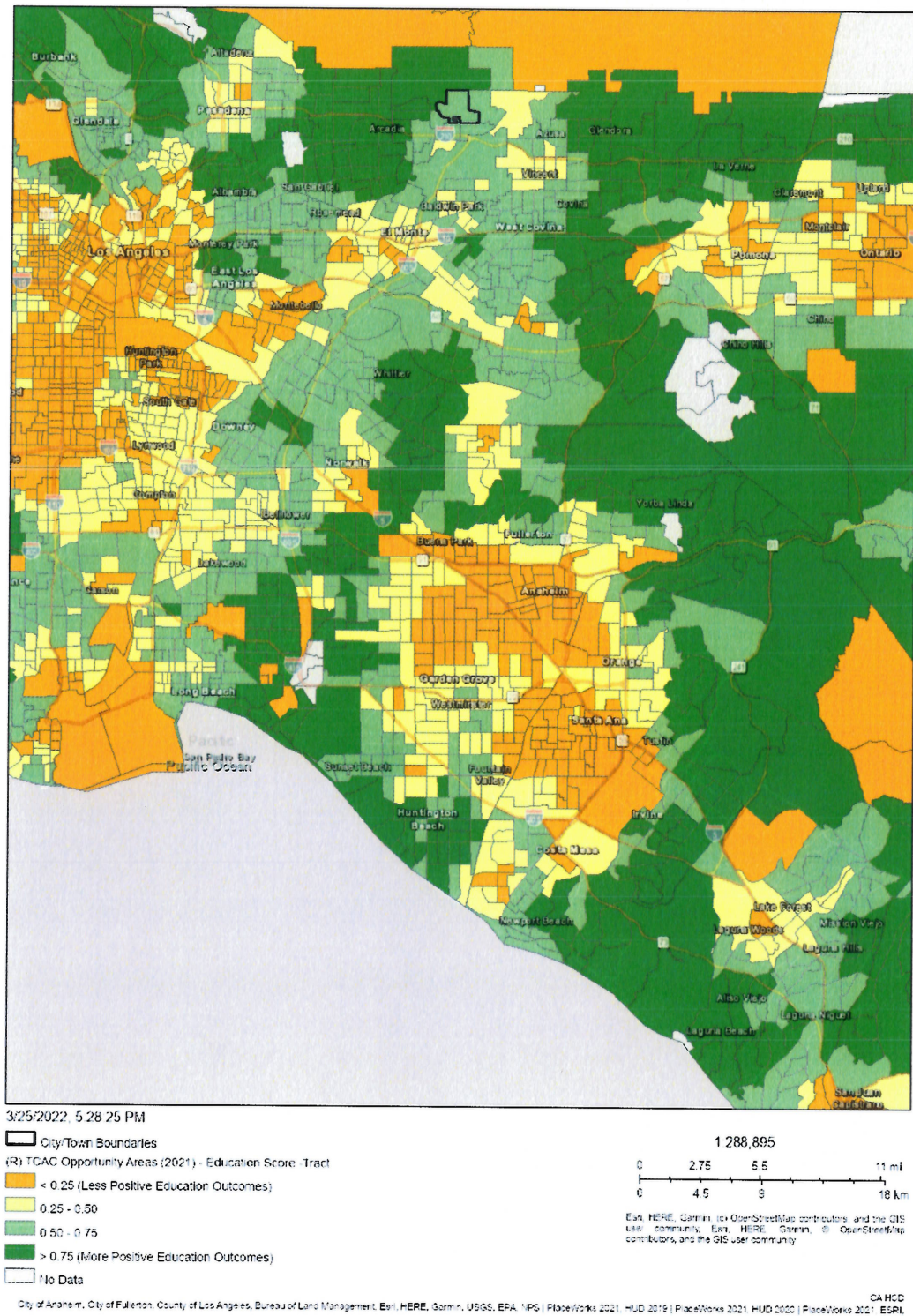
Education

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



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

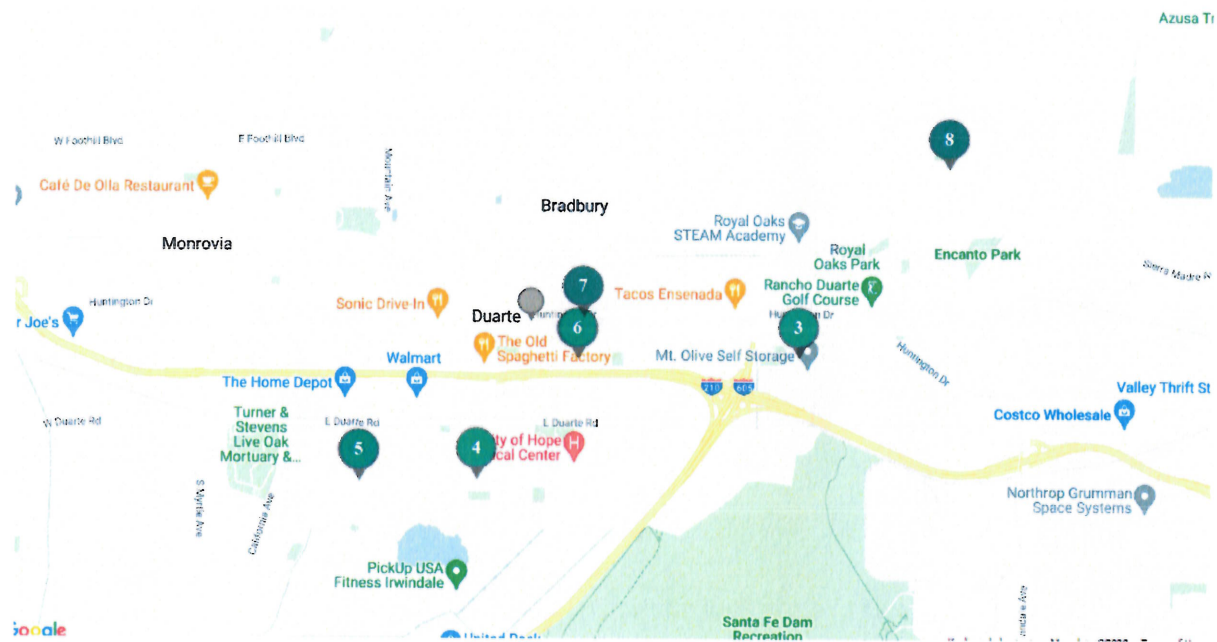


Table 18: Great Schools Detailed Summary Ratings

	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.</p> <p>Source: GreatSchools.org https://www.greatschools.org/california/duarte/duarte-unified-school-district/schools/?sort=rating&tableView=Academic&view=table</p>									

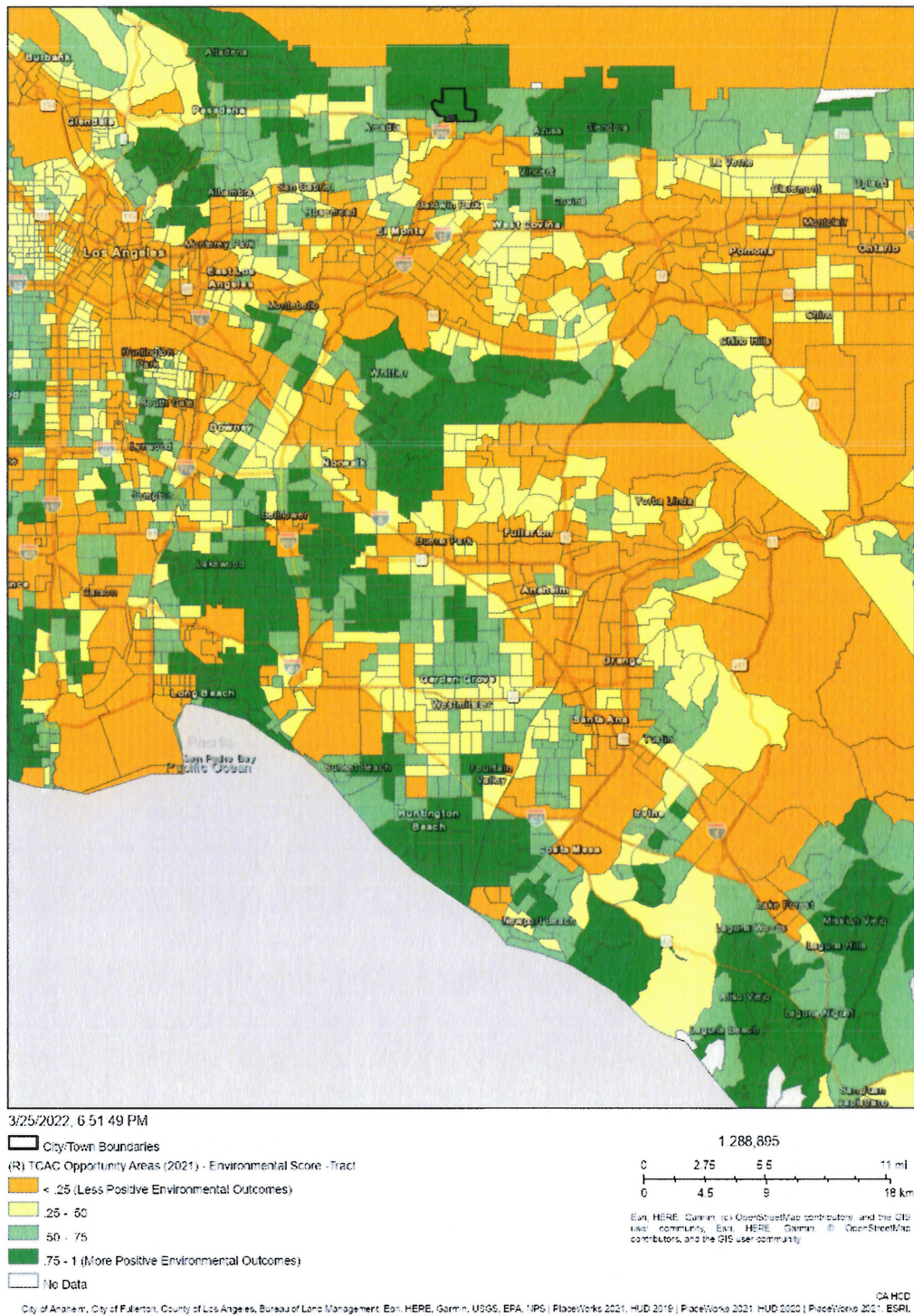
Environmental

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



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

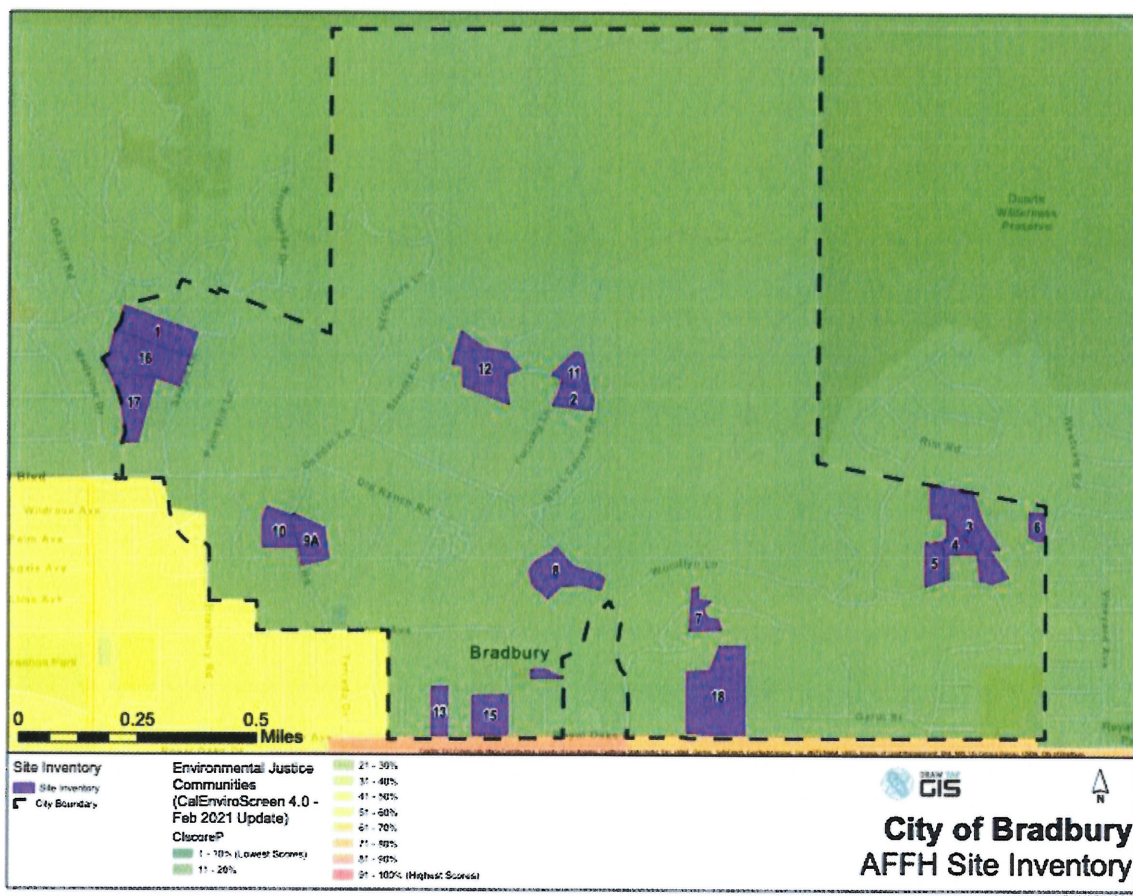
Local Trend

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

[illegible]

Figure 31: Regional Homeowner Cost Burden

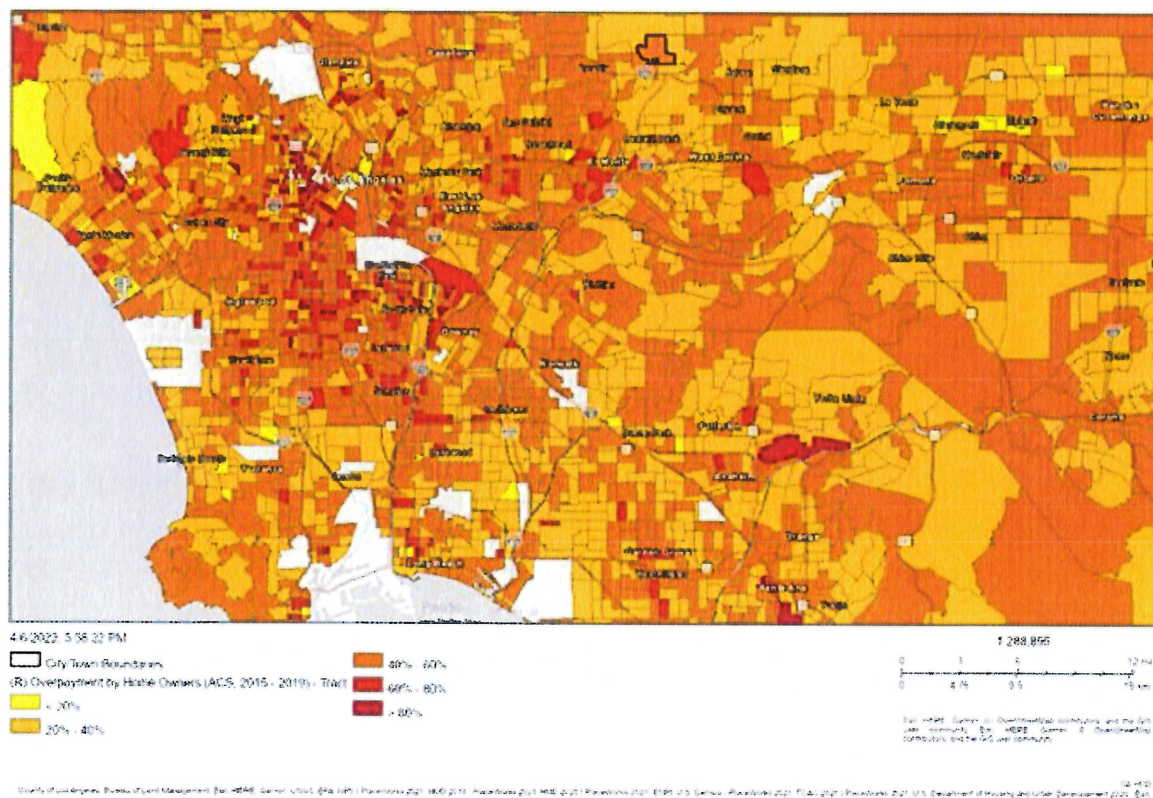
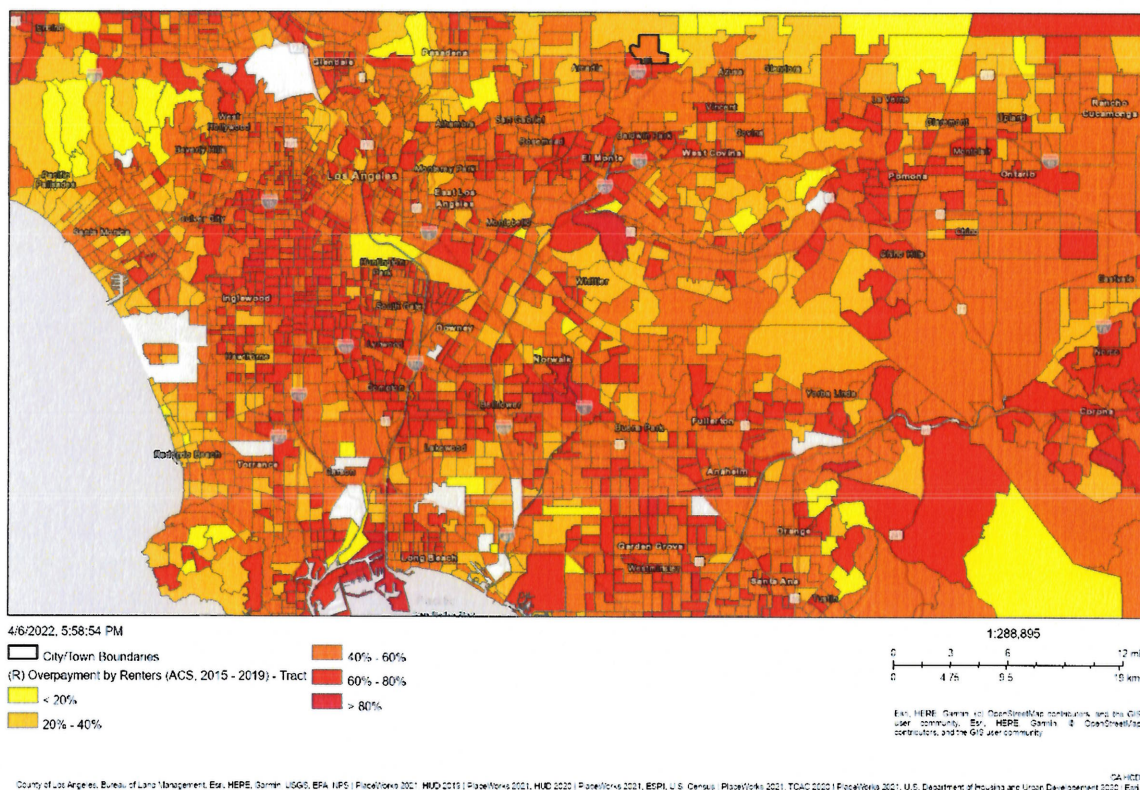


Figure 32: Regional Renter Cost Burden



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

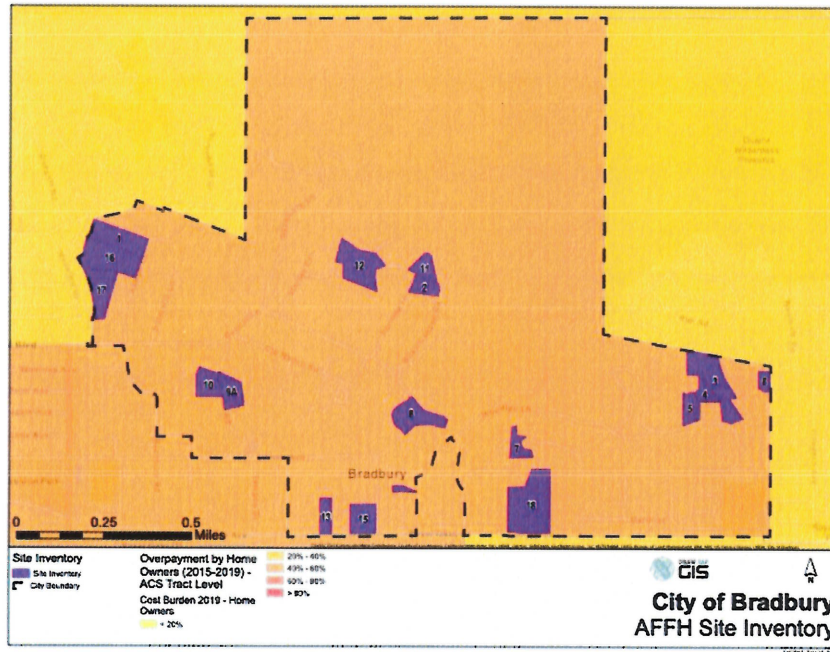
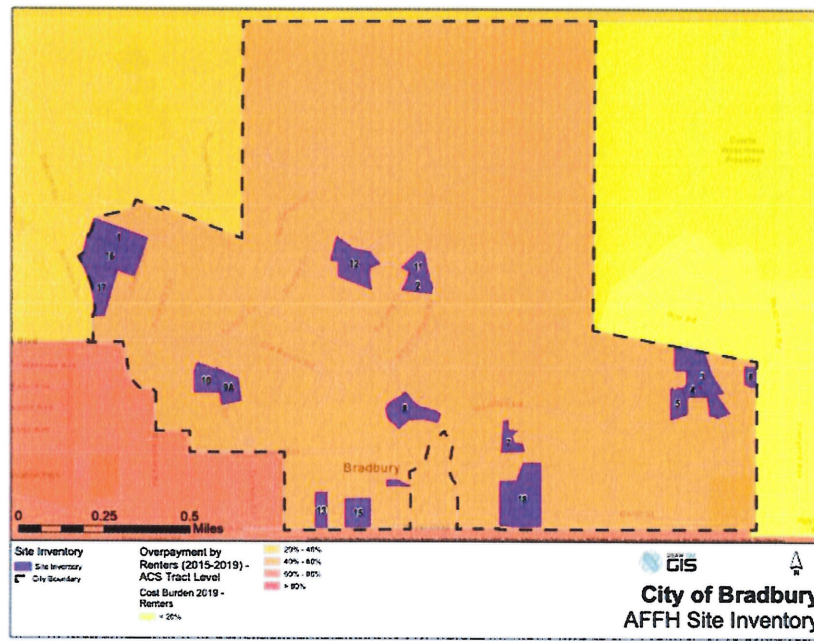


Figure 34: RHNA Units by Overpayment by Renters



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 tenant 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

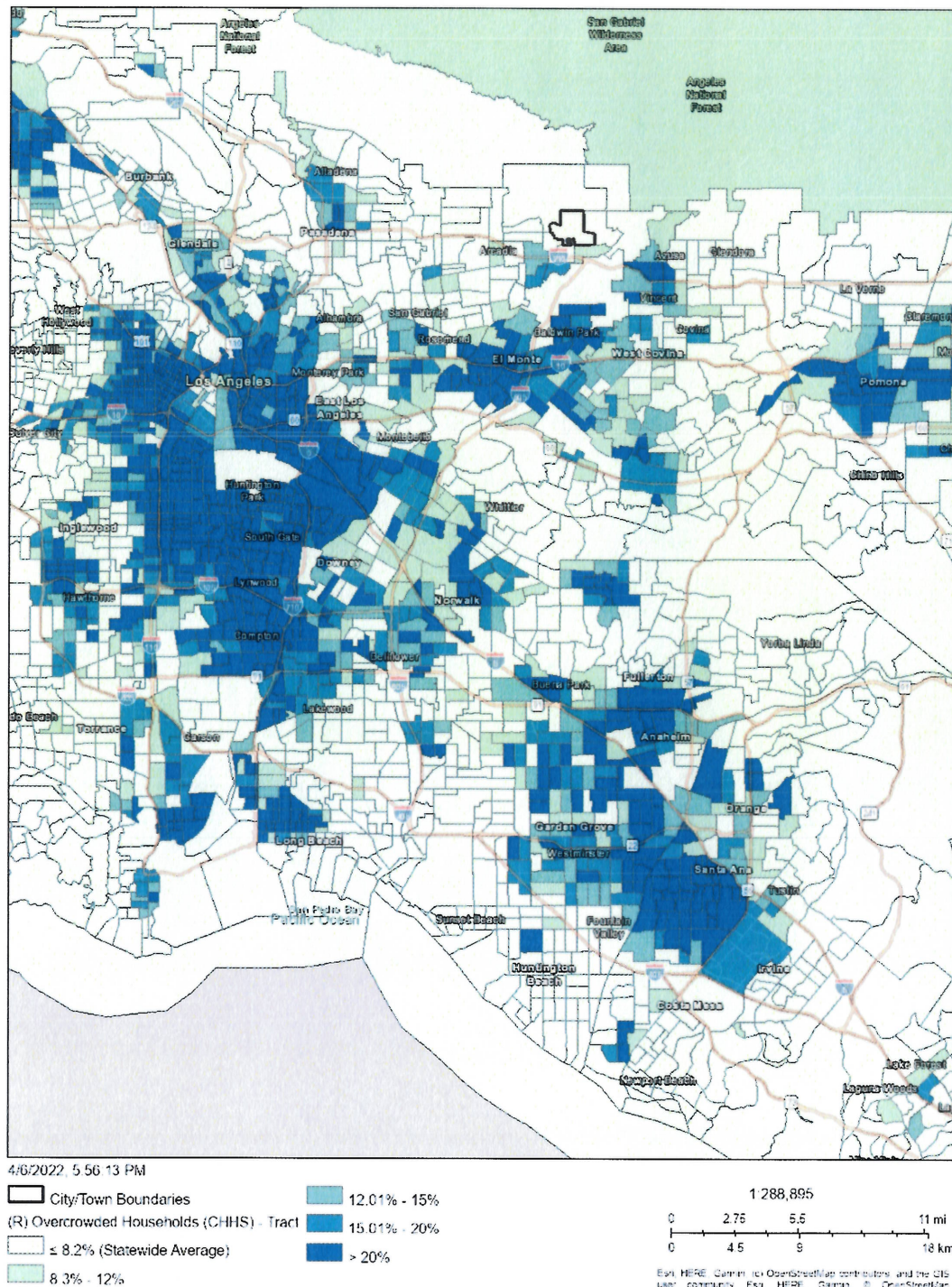
As shown in [Table 23](#), 5.5 percent of owner-occupied households and 16.2 percent of renter-occupied households throughout the County are overcrowded. Severe overcrowding is also an issue in the County, especially amongst renter households. Over one percent of owner households and 7.6 percent of renter 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

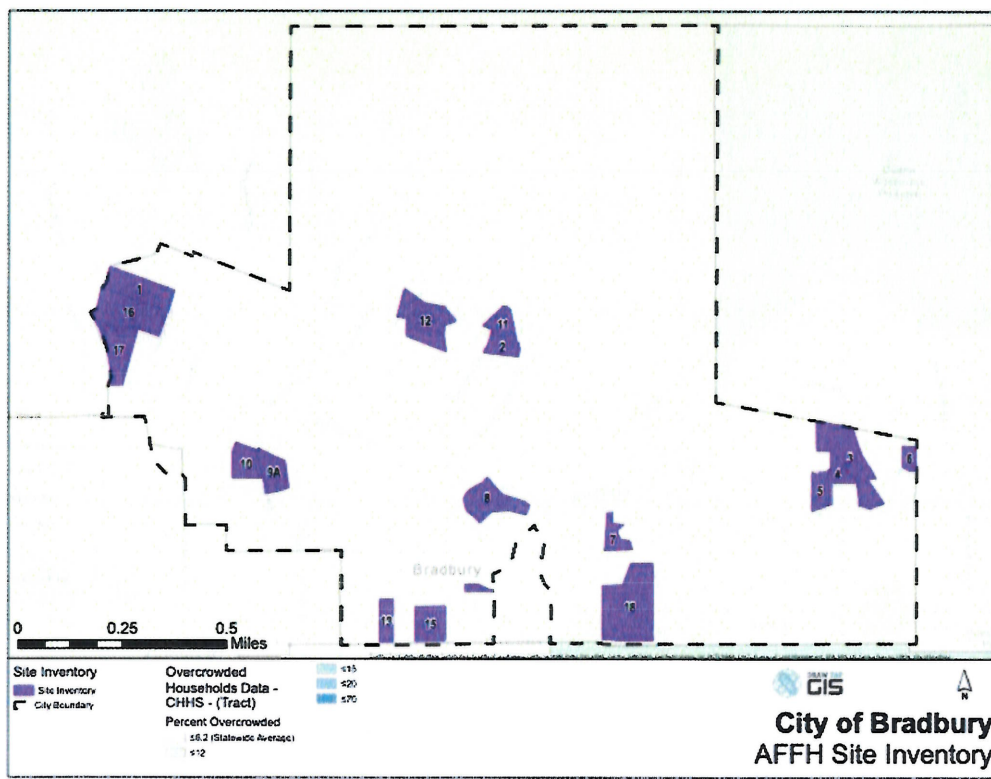
	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
Bradbury					
Owner-Occupied	0	0.0%	0	0.0%	219
Renter-Occupied	0	0.0%	0	0.0%	51
Source: HUD CHAS Data (based on 2014-2018, 2022).					

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

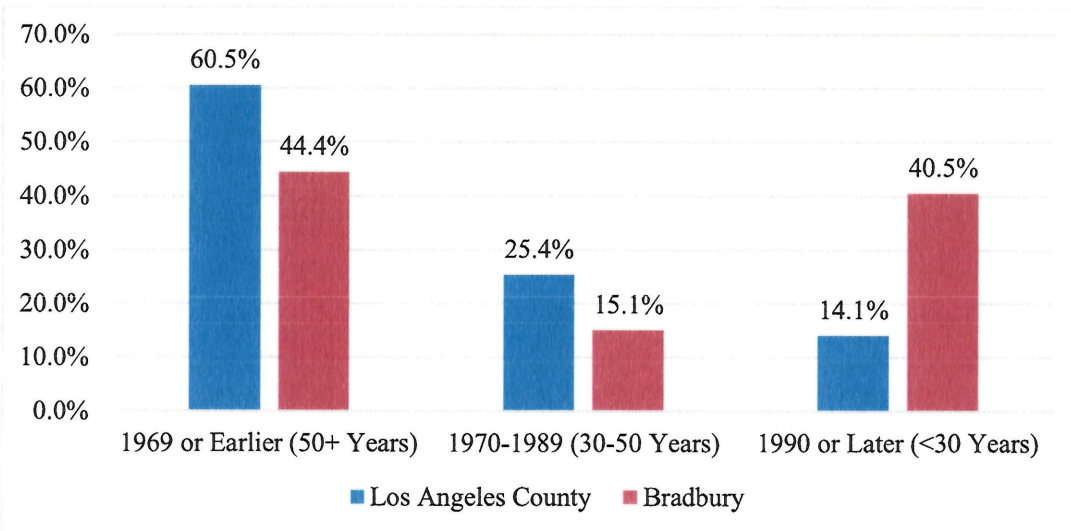
Less than two percent of Los Angeles County households live in substandard conditions, lacking complete kitchen and plumbing facilities or phone services ([Table 25](#)). A higher share of renter households lack complete facilities or phone access than owner-households. In addition, lacking complete 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

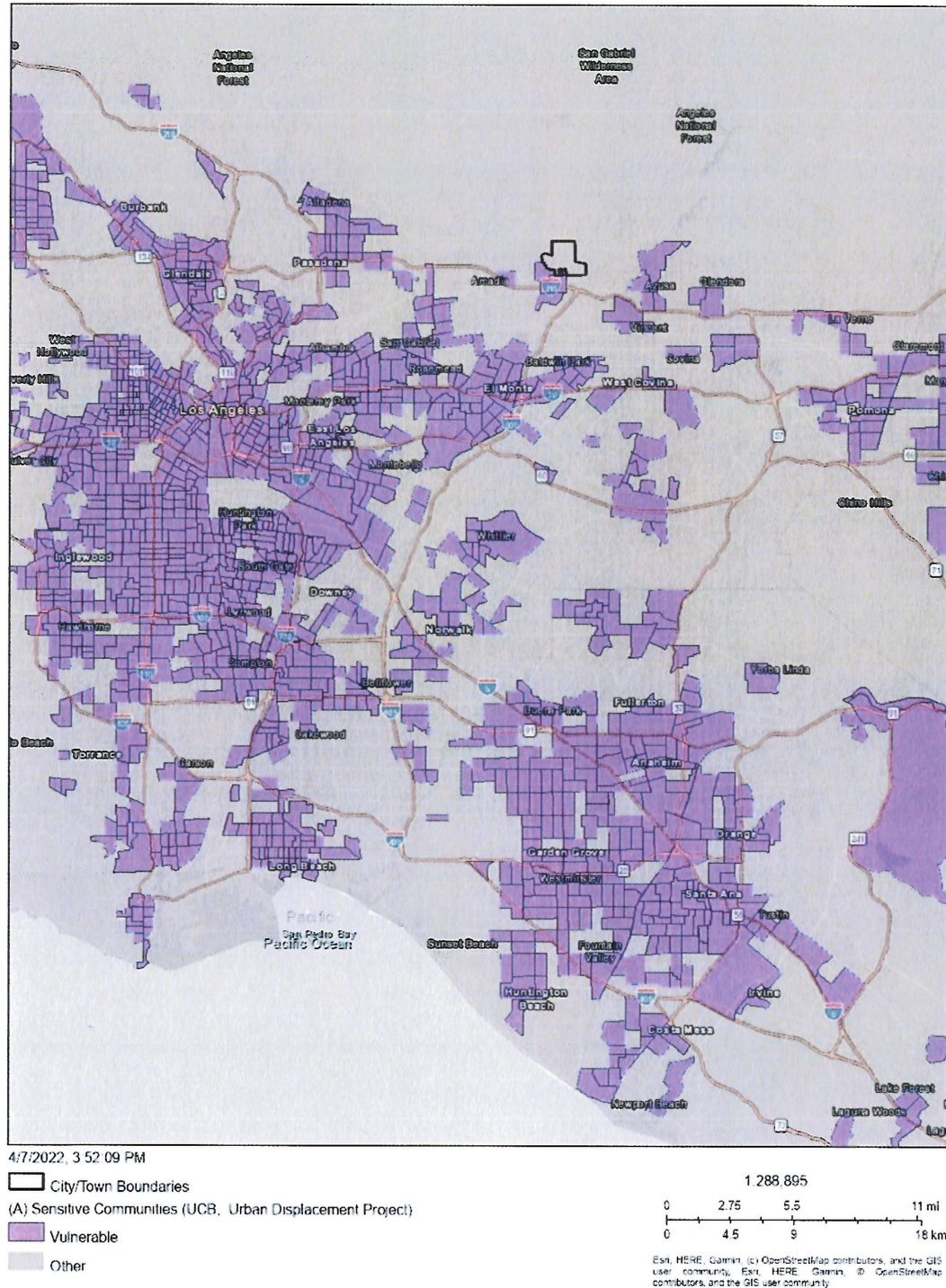
[Figure 38](#) shows sensitive communities at risk of displacement in the region. Vulnerable communities are most concentrated in the central County areas around the City of Los Angeles, Inglewood, South Gate, and Compton, East Los Angeles, and parts of the San Gabriel Valley in Pasadena, El Monte, Rosemead 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



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

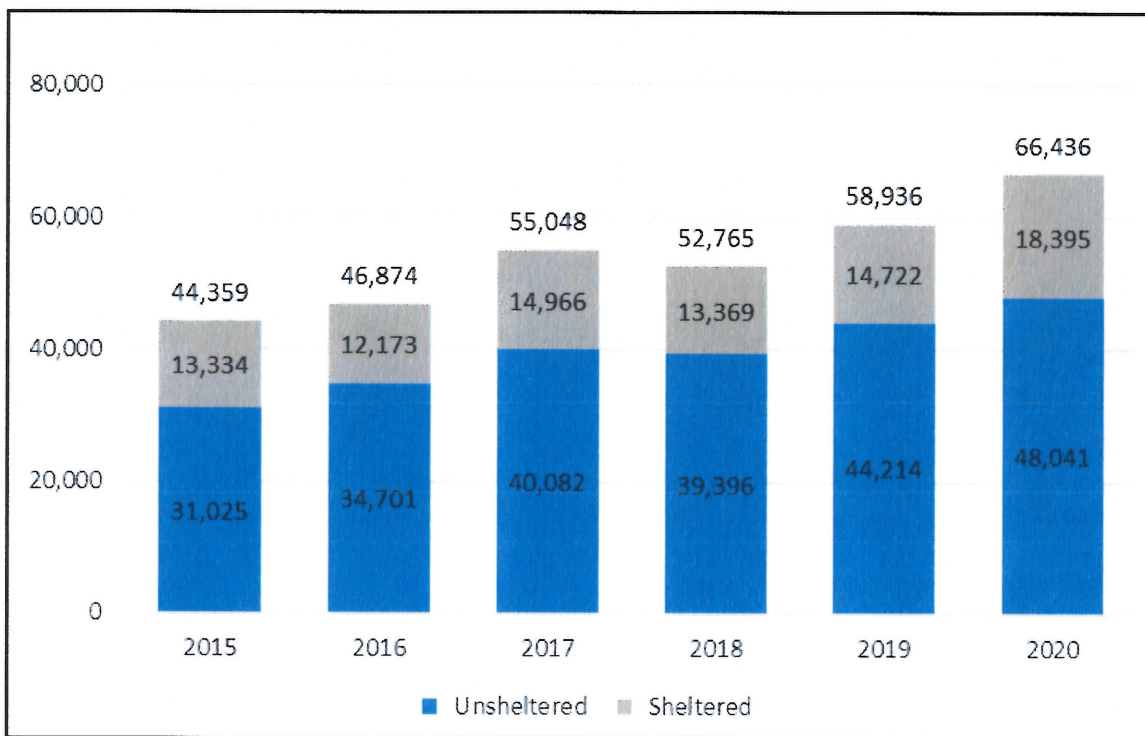
Source: HCD AFFH Data Viewer, Urban Displacement Project, 2021.

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

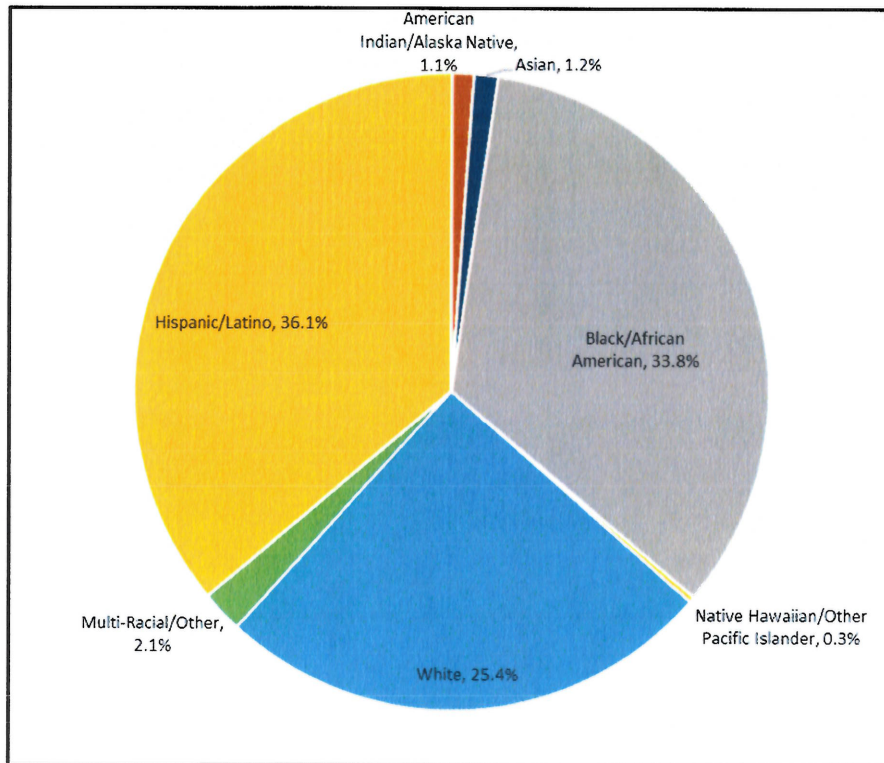


Table 28: Los Angeles CoC Homeless Population by Race/Ethnicity vs Total Population

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

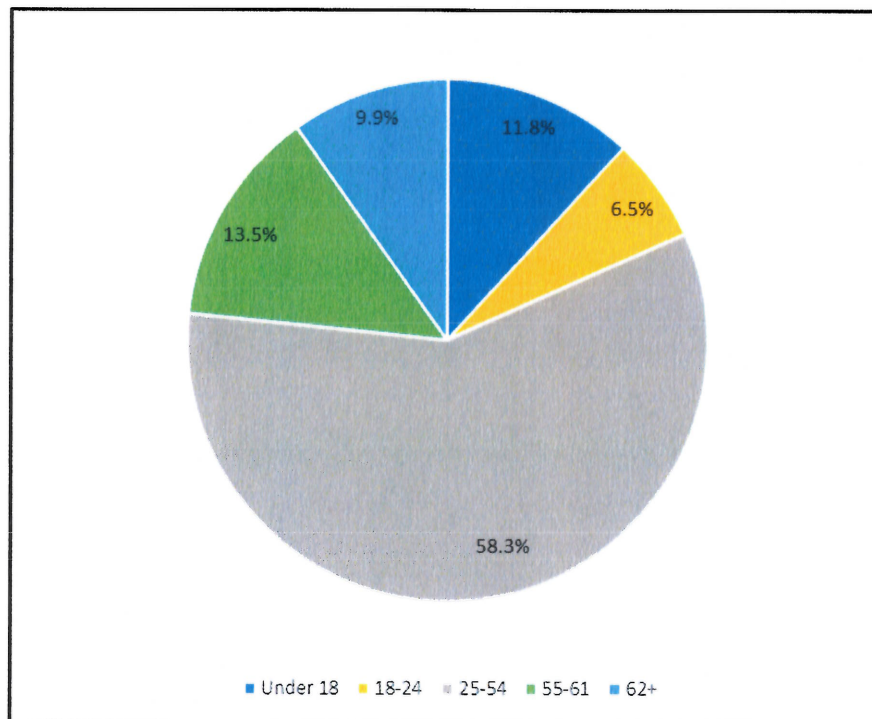


Table 29: Los Angeles CoC Homeless Population by Age vs Total Population

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

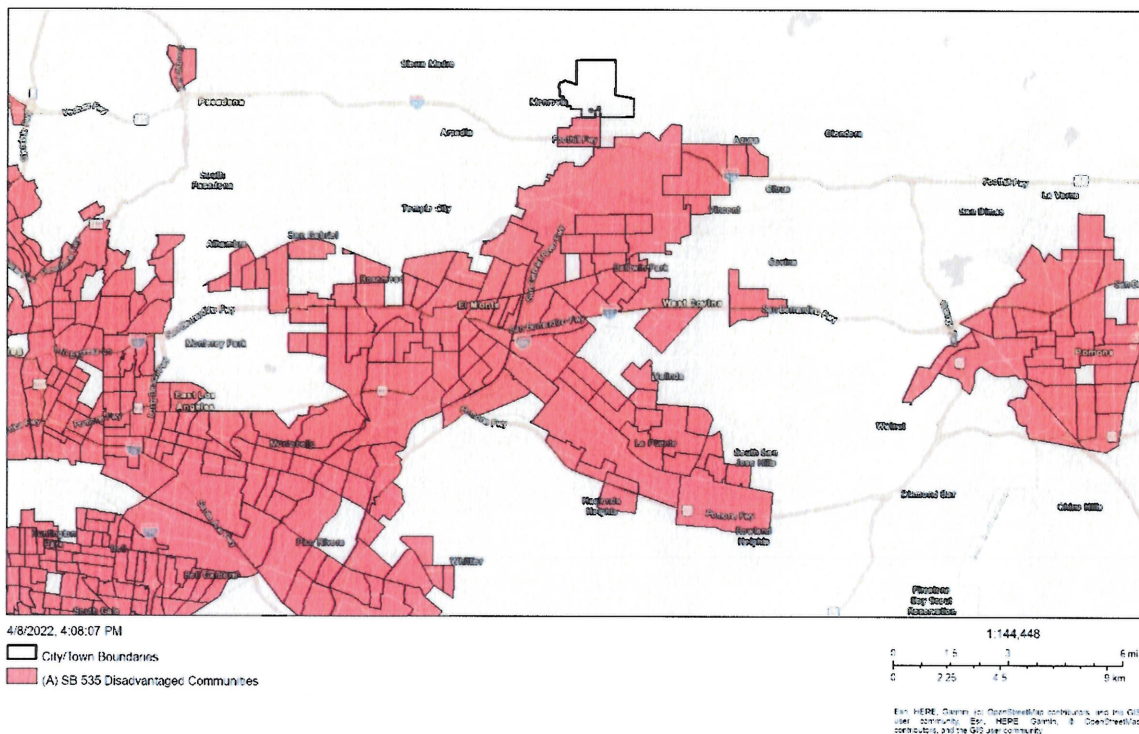
Approximately 34 owner households and 24 of renter households in Bradbury experience a housing problem. Cost burdens are the most prominent problem in the City since there are no estimated zero households experiencing overcrowding and only 1.1 percent of households with substandard conditions. Lower 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.

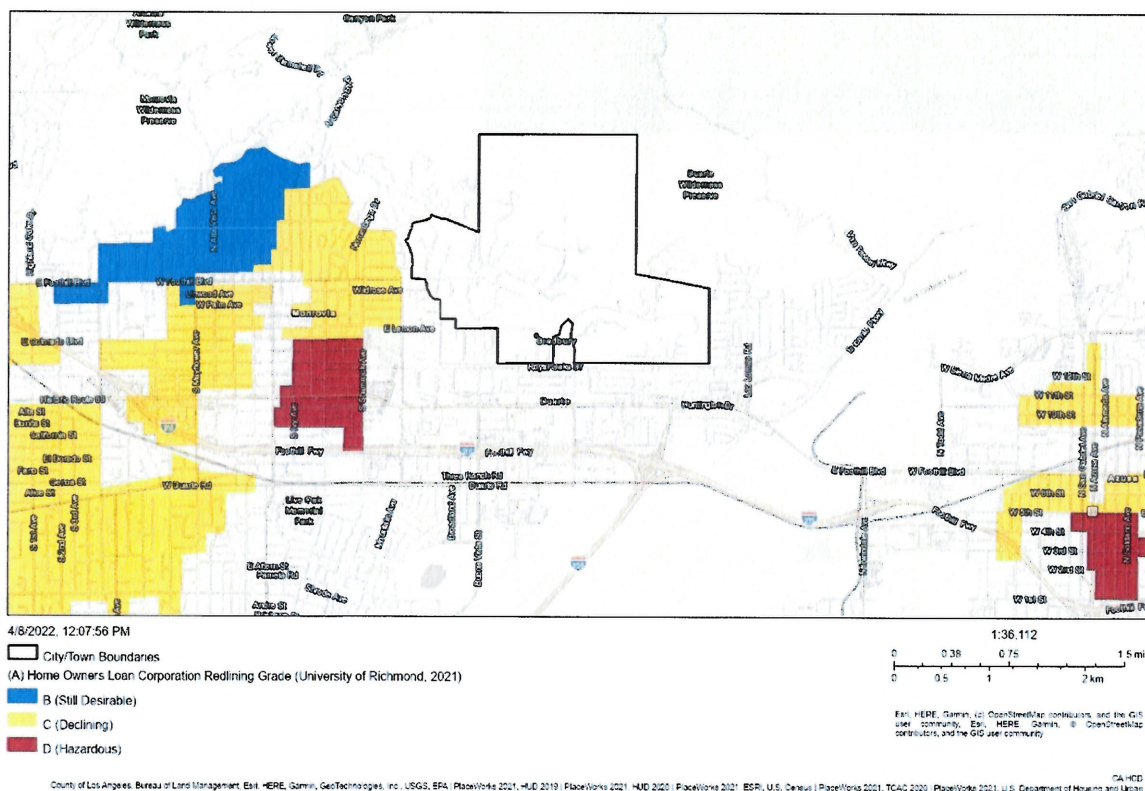
The 1896 Supreme Court ruling of Plessy v. Ferguson upheld the constitutionality of “separate but equal,” ushering in the Jim Crow Era of racial segregation and disenfranchisement. This sentiment spread beyond the South, where African Americans and other minority groups were expelled from predominantly 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).

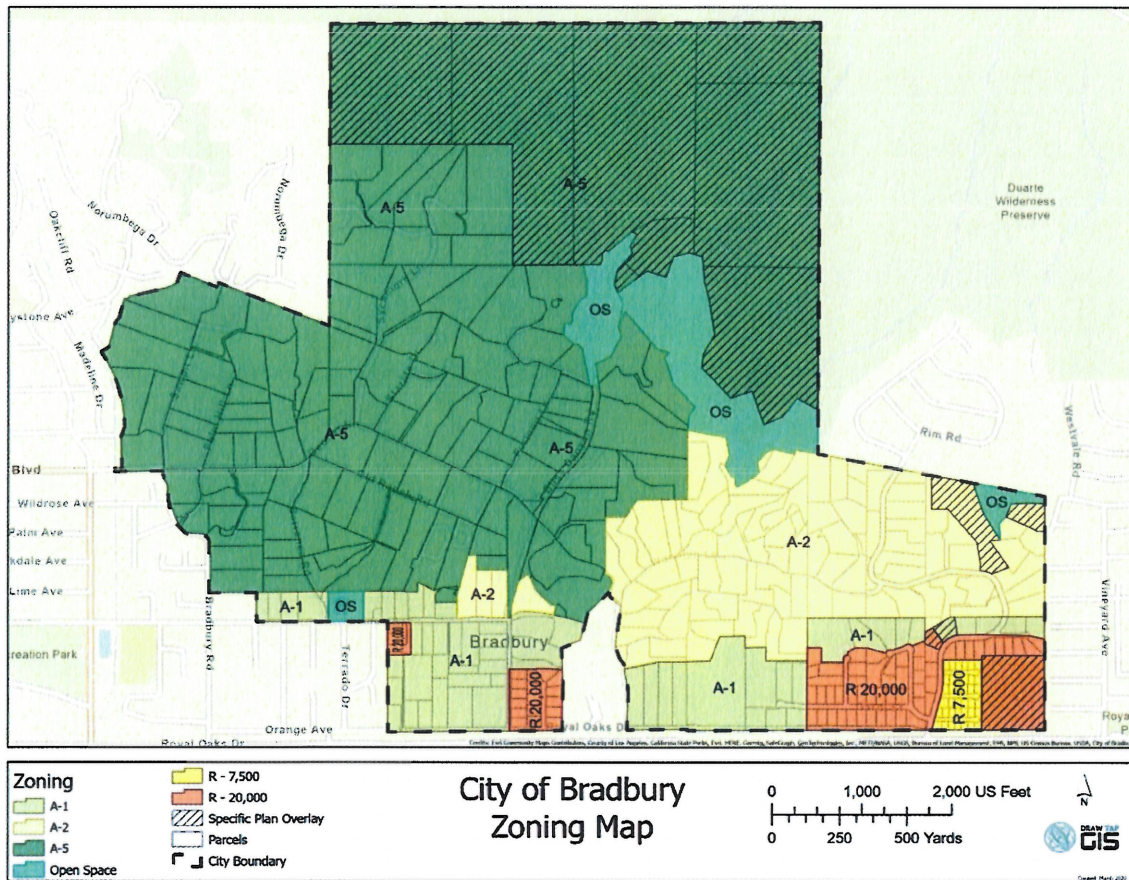
Zoning

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>	---	---	---	27	27
<u>SRO Development</u>	11	0	0	5	16
<u>2nd DUs / ADUs / JADUs on Developed Parcels</u>	5	1	1	2	8
<u>Affordable Housing Overlay</u>	10	8	8	--	18
<u>Total Sites Inventory</u>	26	9	9	34	69
<u>Total Sites in AFFH Analysis</u>	10	8	8	27	45

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>1</u>	<u>1</u>
<u>2</u>	<u>8527-004-020</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>8</u>	<u>8527-024-032</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>9A</u>	<u>8527-025-034</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>10</u>	<u>8527-026-006</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>11</u>	<u>8527-029-001</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>12</u>	<u>8527-029-017</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>16</u>	<u>8527-002-029</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
<u>17</u>	<u>8527-002-030</u>	<u>Vacant Site, A-5</u>	---	---	---	<u>1</u>	<u>1</u>
	<u>Total Northern Bradbury</u>		<u>0</u>	<u>0</u>	<u>0</u>	<u>9</u>	<u>9</u>
<p>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.</p>							

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>1</u>	<u>1</u>
<u>5</u>	<u>8527-016-046</u>	<u>Vacant Site, A-2</u>	---	---	---	<u>1</u>	<u>1</u>
<u>6</u>	<u>8527-016-037</u>	<u>Vacant Site, A-2</u>	---	---	---	<u>1</u>	<u>1</u>
<u>7</u>	<u>8527-021-011</u>	<u>Vacant Site, A-2</u>	---	---	---	<u>1</u>	<u>1</u>
<u>18</u>	<u>8527-021-041</u>	<u>Vacant Site, A-1</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>
Northern Bradbury	0		0	9	9
Southeastern Bradbury	0		0	13	13
Southern Bradbury	10		8	5	23
Total Sites in AFFH Analysis	10		8	27	45

Table 38 summarizes the characteristics of Bradbury's census tract in relation to its sites inventory for the 45 units distributed across Bradbury.

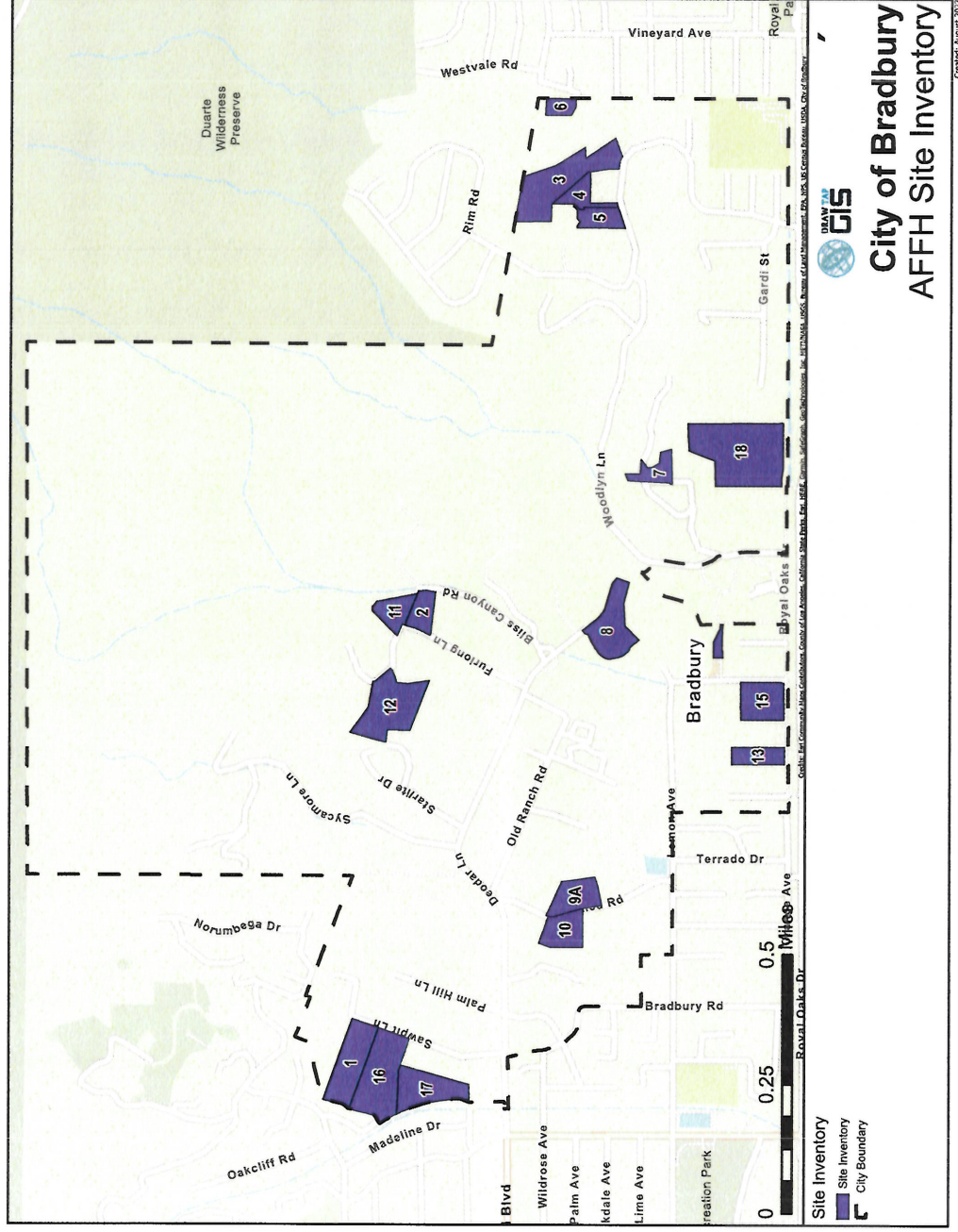
Table 38: Bradbury Sites Inventory AFFH Analysis

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
		Lower Income	Moderate Income	Above Moderate Income		
Census Tract 4302.00	45	10	8	27	54.9%	8.3%
						6.3%
						24.4%

Access to Opportunity						
Tract	Total Capacity (Net Units)	Income Distribution of Potential Units			Economic Domain Score	Education Domain Score
		Lower Income	Moderate Income	Above Moderate Income		
Census Tract 4302.00	45	10	8	27	0.89	0.60
					0.88	0.44
						Highest Resource

Disproportionate Housing Need						
Tract	Total Capacity (Net Units)	Income Distribution of Potential Units			% Cost Burdened Owner Households	% Cost Burdened Renter Households
		Lower Income	Moderate Income	Above Moderate Income		
Census Tract 4302.00	45	10	8	27	33.3%	16.9%
					0%	1.1%
						Homeless Population

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
<i>Infrastructure:</i> Existing or planned infrastructure to accommodate the regional housing need, including water, sewer and dry utilities	IV-27
<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.	N/A
<i>Affirmatively Furthering Fair Housing:</i> Identified sites throughout the community that affirmatively furthers fair housing (see page 5 of checklist)	APP B
<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	IV-33
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.	N/A
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))	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 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: