To: [Paul.McDougall@HCD.ca.gov](mailto:Paul.McDougall@HCD.ca.gov), [Shawn.Danino@HCD.ca.gov](mailto:Shawn.Danino@HCD.ca.gov)

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Dear Mr. McDougall and Mr. Danino,

Upzoning is unnecessary and should be taken out of Culver City’s Housing Element (“HE”). The Housing Element makes it clear that converting single-family R1 lots to allowing 4-units per lot R4 (“upzoning”) is not required to meet the state’s requirements. Upzoning should be stripped out of the Housing Element because it represents a solely political and ideological overreach. I urge you to reject Culver City’s Housing Element.

Here’s Why:

* Using *current* zoning, builders could supposedly create all but 201 lower-income units (HE, Table 32). This shortfall could be easily met by other means, such as encouraging more mixed-use projects.
* Upzoning is based on a new and unsupported theory called “incremental infill.”
* Based on real calculations, incremental infill will not result in lower-income units being built in single-family areas.
* Upzoning residential properties only leads to the creation of market-rate housing.
* The Housing Element requires zoning changes with a 120% buffer equivalent to 4,040 new housing units in the next 8 years. (HE, Table 32). This shows that the planners are including zoning and regulatory changes which will force future city councils to allow significantly more development than the city needs or possibly can sustain. The State’s Housing & Community Development Department (“HCD”) guidelines say only 15-30% buffer is needed.
* Under current City zoning and regulations, there is more than enough capacity to meet state requirements for low, moderate, and market-rate housing without incremental infill
* Incremental infill is projected to create only 135 housing units, equivalent to 68 duplexes or 45 triplexes or 34 quadplexes. There is no urgent “need” to change the property rights of over 5,000 homeowners for such a low expected yield (HE, Table 32).
* Upzoning will lead to higher property values, further pricing out new home buyers and renters.
* The City Council’s approval of zoning to allow residential in commercial areas will meet the needs of housing for all income levels, and by providing more housing will alleviate the affordable housing crunch in Culver City. There is no objectively justifiable need to rezone residential areas.
* The City has already allowed a wider variety of business uses in mixed-use projects encouraging more development.
* Owners of shopping centers have already expressed their interest in adding housing units which also means that there is no urgent need for upzoning.

The Housing Element will control what zoning the city will have to implement. There is no objectively supportable reason to change single-family zoning other than a politically motivated idea to create more and more density and more and more housing that has no direct connection to affordability.

In conclusion, since the upzoning will not answer the state requirements it should be stripped completely from the Housing Element.

NAME

CONTACT INFORMATION