

**City of Commerce  
2021-2029 Housing Element Update  
Initial Study and Negative Declaration**

*Lead Agency:*

City of Commerce  
Economic Development and Planning  
2535 Commerce Way  
Commerce, California 90040



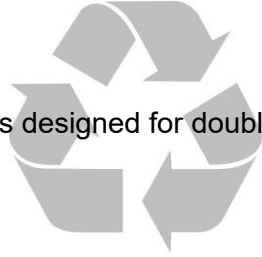
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Appendix A Draft City of Commerce 2021-2029 Housing Element



# 1 Introduction

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The purpose of this Initial Study (“IS”) is to identify and assess the significance of the physical effects on the environment due to potential future development guided by the goals and policies of the City of Commerce (“City”) 2021-2029 Housing Element Update (“project”). Pursuant to the California Environmental Quality Act (“CEQA”), the proposed Housing Element Update (“HEU”) is considered a “project” and, thus, requires analysis and determination of environmental effects prior to approval.

This IS has been prepared in accordance with the CEQA Statutes and Guidelines and the City of Commerce local rules and regulations. The proposed project requires discretionary approval by the City of Commerce and review by the California Department of Housing and Community Development (“HCD”). As the project initiator, and because of the legislative approvals involved, the City of Commerce is the Lead Agency with respect to this Initial Study pursuant to Section 15367 of the CEQA Guidelines. Specifically, the HEU Project requires City of Commerce approval of a General Plan Amendment. No other governmental agencies have discretionary permitting authority with respect to approval of the proposed project, and no Trustee Agencies, as defined in §21070 of the CEQA Statutes, has jurisdiction over resources such that Trustee agency approval is required for entitlement approval.

Pursuant to §15074 of the CEQA Guidelines, prior to approving the project, the City of Commerce is obligated to consider the findings of this IS and to either adopt a Negative Declaration (“ND”) or a Mitigated Negative Declaration (“MND”) or determine that an Environmental Impact Report (“EIR”) is required due to potentially significant, unavoidable environmental impacts. The findings of this IS support adoption of a Negative Declaration (ND), as discussed in Section 4. This determination indicates that the environmental impacts of the programs for accommodating housing pursuant to the proposed HEU, in accordance with the governing land use planning policies and zoning standards, would be less than significant, would not require incorporation of mitigation, and would not require preparation of an EIR.

## 1.1 – Contents

This document has been prepared to comply with Section 15063 of the State CEQA Guidelines that sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (see Section 2)
- Identification of the environmental setting (see Section 2.11)
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (see Section 3)
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (see Sections 2.6 and 2.7)
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (see Section 5.1)

## 1.2 – Tiering

Section 15152 et al of the CEQA Guidelines describes “tiering” as a streamlining tool as follows:

- (a) “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on

narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

- (b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.
- (c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.
- (d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects which:
  - (1) Were not examined as significant effects on the environment in the prior EIR; or
  - (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.
- (e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.
- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.
  - (1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.
  - (2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).
  - (3) Significant environmental effects have been "adequately addressed" if the lead agency determines that:

- (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or
  - (B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.
- (g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.
- (h) There are various types of EIRs that may be used in a tiering situation. These include, but are not limited to, the following:
- (1) General Plan EIR (Section 15166)
  - (2) Staged EIR (Section 15167)
  - (3) Program EIR (Section 15168)
  - (4) Master EIR (Section 15175)
  - (5) Multiple-family residential development/residential and commercial or retail mixed-use development (Section 15179.5)
  - (6) Redevelopment project (Section 15180)
  - (7) Projects consistent with community plan, general plan, or zoning (Section 15183)

This Initial Study for the 2021-2029 Housing Element has been prepared to tier from the General Plan “Program” EIR (SCH# 21001101128) of the City of Commerce dated January 2008, as amended or otherwise supplemented. For the City of Commerce, documents by which the analysis recorded herein has been tiered from are available for public review at: <https://www.ci.commerce.ca.us/city-hall/economic-development-and-planning/planning-environmental-documents-for-review>.

### **1.3 – Approach**

The environmental analysis contained in this Initial Study is based on the following assumptions:

**General Plan Consistency:** As the General Plan is updated and/or amended, the City of Commerce will ensure that such updates and amendments do not prevent implementation of the policies contained in the updated Housing Element.

**Categorical Exemptions:** Smaller-scale ministerial projects that require issuance of building permits without need for discretionary action are generally exempt from environmental review pursuant to CEQA in the absence of compelling evidence that the project is unique in that it may result in significant individual and/or cumulative impacts. Smaller-scale projects may be exempt from CEQA and require no further analysis. Exempt projects are considered to have no significant impact on the environment, as defined in Section 15300 of the CEQA Guidelines.

**Project Specific Environmental Review:** Future development proposals not exempt from CEQA will be subject to the environmental review process to identify potential impacts and impose appropriate mitigation measures, if needed, to avoid significant impacts.

**Purpose of Environmental Review:** The proposed Housing Element Update does not authorize any plan for construction of new homes or other uses or the redevelopment of any properties within the local

jurisdiction. No direct environmental impacts, therefore, will occur as a result of adoption of the HEU. This Initial Study assesses the potential programmatic level environmental impacts resulting from potential development facilitated by the Housing Element in accordance with the Lead agency's existing land use policies.

No changes to the use, density or intensity, or other land use policies are proposed at this time as part of the Housing Element Update. The City will subsequently undertake focused General Plan and Zoning ordinance amendments, with their own CEQA documentation, to ensure sufficient land use capacity is available to accommodate the Regional Housing Needs Allocation (RHNA).

The purpose of the environmental analysis conducted for the Housing Element Update, as documented herein, is to determine general impacts that could result from implementation of the Housing Element Update. The analysis is based on a hypothetical development scenario for the Inventory Sites identified in the Housing Element and how construction and operation of those sites may result in impacts to the environment. Because this is a program-level analysis, some measure of forecast and assumption is necessary in order to characterize potential development scenarios and should not be construed as speculative or unreasonable. Therefore, the program-level analysis of the potential impacts of the Housing Element Update is inherently broad and typically qualitative due to the lack of specific project-level information.

Following the adoption of this Housing Element Update, the City will be undertaking focused General Plan and zoning ordinance amendments, described below, to ensure sufficient land use capacity is available to accommodate the RHNA. This Initial Study examines the potential environmental impacts at a program level for only the Housing Element since the Housing Element itself does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur. Impacts associated with the General Plan and zoning ordinance amendments would be examined at a more focused level since these actions could increase the level of development allowed at specific sites.

## 2 Project Description

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### **2.1 – Project Title**

City of Commerce 2021-2029 Housing Element Update

### **2.2 – Lead Agency Name and Address**

City of Commerce  
2535 Commerce Way  
Commerce, California 90040

### **2.3 – Contact Person and Phone Number**

Louis Morales, Interim Director of Economic Development and Planning  
(323) 722-4805

### **2.4 – Project Location**

The City of Commerce 2021-2029 Housing Element applies to all residential and mixed-use zoning districts and all General Plan land use designations that allow residential or mixed-use development within the municipal boundaries of the City of Commerce. Located within Los Angeles County, the City of Commerce is bounded by the City of Los Angeles to the northwest, the community of East Los Angeles of unincorporated Los Angeles County to the north, the City of Montebello to the east, the San Gabriel River and the City of Downey to the southeast, the City of Bell Gardens to the south, the City of Bell to the southwest, and the City of Vernon to the west. The City encompasses approximately 6.6 square miles (4,160 acres). Exhibit 1 (Regional Context Map) illustrates the City's location within Los Angeles County and its local context. (Reference: 1.1)

### **2.5 – Project Sponsor's Name and Address**

City of Commerce  
Economic Development and Planning  
2535 Commerce Way  
Commerce, California 90040

### **2.6 – General Plan Land Use Designations**

The residential and mixed-use land use designations that support housing development within the City of Commerce are listed below. (Reference: 1.2) The General Plan designation is provided followed by the corresponding zoning district.

*Low-Density Residential (LDR):* Land uses within this designation are characterized by single-family homes and correspond to the R-1 (single-family residential) zoning district. Permitted residential development densities range from 0 to 11 units per acre under this designation. Assuming an average household size of 3.8 persons, the population density for this designation is estimated to be 42 persons per acre.

*Medium-Density Residential (MDR):* The Medium-Density Residential land use designation corresponds to the R-2 (Medium Density Residential) zoning district. Permitted uses within this land use designation include single-family homes and duplex units. The potential intensity of development within those areas designated Medium-Density Residential ranges from 0 to 17 units per acre. The corresponding population density is approximately 65 persons per acre.

*High-Density Residential (HDR):* This category of land use corresponds to the R-3 (High-Density Residential) zoning district that provides for higher-density residential development including multiple-family residential development. The permitted development densities range from 0 to 27 units per acre, yielding a population density of approximately 103 persons per acre.

*Mixed-Use:* This land use designation applies to the Atlantic Avenue (AMU) corridor between the Mix-Master (on the north) and Washington Boulevard (on the south). This land use provides for both residential development and commercial development. A new overlay zone is proposed for this area along with design guidelines for new development. Development intensity for commercial uses are defined using a floor-area ratio (FAR) that refers to the ratio of the building's gross floor area to the total area of the parcel. The maximum floor area ratio for development permitted under this designation is 0.5:1 that corresponds to the maximum allowable lot coverage for the C-1 and C-2 zoning districts. The permitted residential development densities range from 0 to 27 units per acre.

*Housing Opportunity Area (HOA):* This designation applies to the industrial properties located within the Bandini-Rosini planning area. This land use designation permits these manufacturing uses to recycle to residential development should the property owner desire to do so. At such time the property owner determines industrial uses are no longer economically viable, the property must transition to residential uses. The permitted residential development densities range from 0 to 27 units per acre yielding a population density of approximately 103 persons per acre. The development standards for the industrial uses correspond to those of the Industrial land use designation.

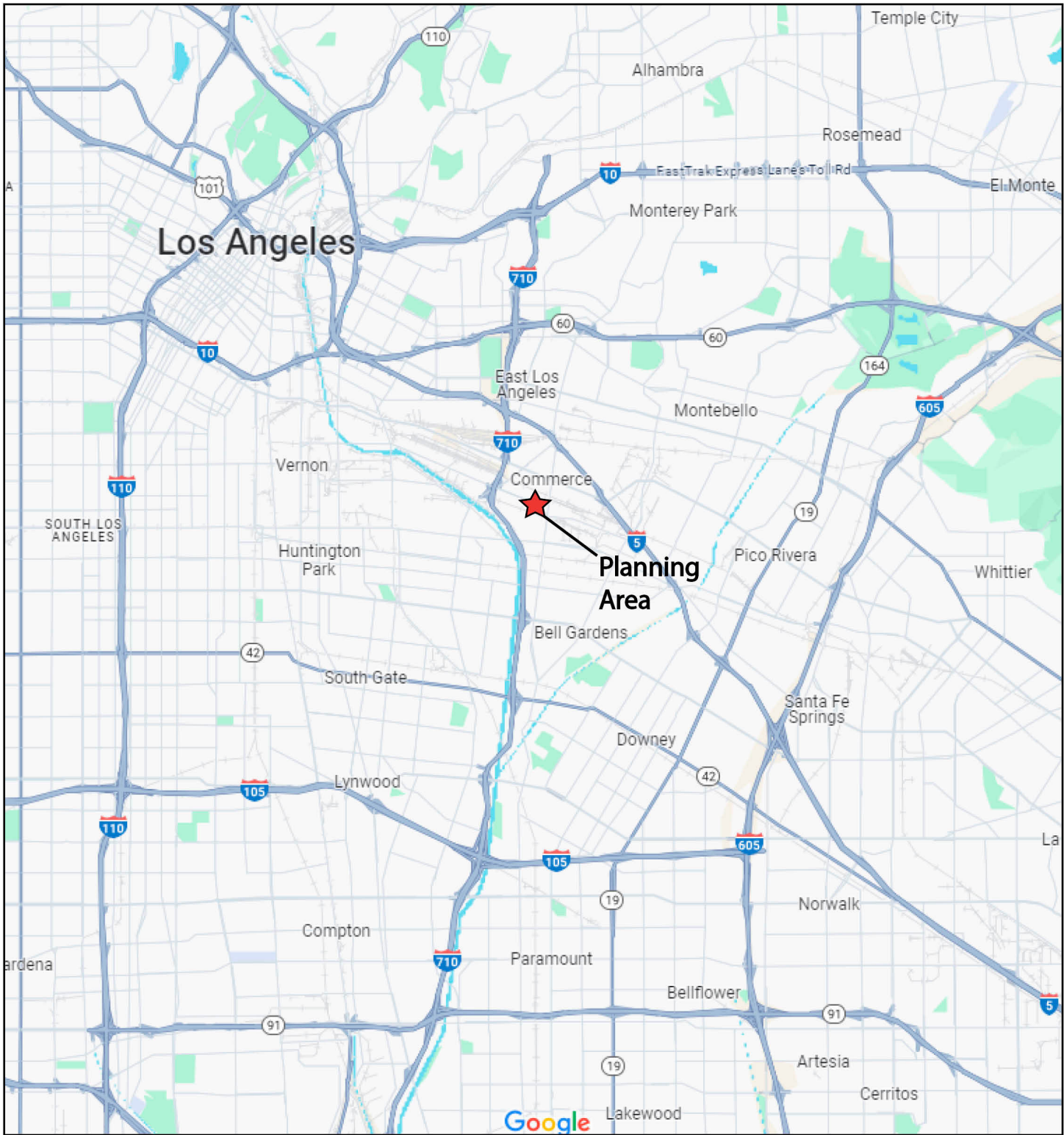
## **2.7 – Zoning Districts**

Zoning districts that support residential development within the City of Commerce are listed below. Currently, the City's adopted Zoning Map is not consistent with the Zoning Text. For purposes of the analysis presented in this Initial Study, the Zoning Map has been used to describe applicable zoning districts. (Reference: 1.3)

*Single Family Residential Zone (R-1):* The purpose of the R-1 zone is to provide areas for the development of detached and attached single-family dwellings that incorporate private outdoor open spaces into individual living environments. The zone is intended to protect and stabilize desirable characteristics of single-family residential areas, such as minimum lot sizes and separation from incompatible uses.

*Light Multiple Residential Zone (R-2):* The purpose of the R-2 residential zone is to provide an environment suitable for both single-family and duplex units. The intent is to promote desirable characteristics for medium-density living and to stabilize existing medium-density areas. Lots in the R-2 zone may accommodate one or two single-family detached units or duplex units.

*Medium Multiple Residential Zone (R-3):* The purpose of the R-3 zone is to provide opportunities for persons to live in medium- or high-density residential developments. Lots in this zone provide common open space areas and amenities. The R-3 zone is primarily intended to accommodate apartments and other multi-family dwellings, although single-family and duplex residences are also permitted.



Source: Google Maps  
<http://www.migcom.com> • 951-787-9222

## Exhibit 1 Regional Context Map

Commerce 2021-2029 Housing Element Update  
 Commerce, California



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## 2.10 – Project Description

The project is the adoption of the Commerce 2021-2029 Housing Element that represents an update of the City's certified Housing Element (see Appendix A). The Housing Element is an integral component of the City's General Plan as it addresses existing and future housing needs of all types for persons in all economic segment groups within the City. The Housing Element serves as a tool for decision-makers and the public in understanding and meeting housing needs in Commerce. While the law does not require local governments to actually construct housing to meet identified needs it does require that the community address housing needs in its discretionary planning actions such as creating opportunities for housing in their general plan and facilitating development through policies.

### Statutory Requirements

State law requires that all housing elements address four key topics: housing needs, constraints to housing development, housing resources, and a housing plan. Analysis of these topics provides the foundation for the preparation of a housing element. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the Government Code sets forth the legal requirements for a housing element and encourages the provision of affordable and decent housing in suitable living environments for all communities to meet statewide goals. The 2021-2029 Housing Element Update is a policy document by the City of Commerce regarding its current and projected future housing needs, and the City's goals, policies, and programs to address those identified needs. (Reference: 1.4)

Specifically, Section 65580 states the housing element shall consist of "...an identification and analysis of existing and projected housing needs and a Statement of goals, policies, quantified objectives, financial resources and scheduled programs for the preservation, improvement, and development of housing." The housing element must also contain a housing plan with quantified objectives for the implementation of the goals and objectives described in the housing element, to be carried out during the planning period (2021-2029). State law requires the Housing Element be updated at least every eight years, on a timeline consistent with the Regional Transportation Plan, unless extended by the legislature. (Reference: 1.4) Government Code Section 65583 requires that housing elements include the following main components: (Reference: 1.4)

- An assessment of housing needs (including the needs of special needs groups), analysis of constraints to housing development, and an inventory of resources related to the meeting of these needs.
- A review of the previous Housing Element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the programs in the previous Housing Element.
- A statement of community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.
- A schedule of actions that the city is undertaking or intends to undertake, in implementing the policies set forth in the Housing Element.

### Regional Housing Needs Allocation

Several factors influence the demand for housing in the City of Commerce. Four major "needs" categories considered in the City of Commerce 2021-2029 Housing Element include: 1) housing needs resulting from population growth, both in the City and the surrounding region; 2) housing needs resulting from overcrowding of units; 3) housing needs that result when households are paying more than they can afford for housing; and 4) housing needs of "special needs groups" such as the elderly, large

families, female-headed households, households with a disabled person, farm workers, and the homeless. The City of Commerce 2021-2029 Housing Element Update profiles key community demographics and examines the related housing needs of various groups, including owners versus renters, lower-income households, overcrowded households, elderly households, special needs groups, and homeless persons, among others. This information is detailed in the Housing Element Update. California housing element law requires that each city and county develop local housing programs designed to meet their “fair share” of housing needs for all income groups, based on projected population growth. The Regional Housing Needs Allocation (RHNA) is a critical part of State housing element law (Government Code Section 65580). The process for determining the RHNA is briefly described below:

- The State Department of Housing and Community Development uses a California Department of Finance growth projection and other factors to determine the number of housing units that are needed statewide over an eight-year planning period (for Commerce and other Southern California jurisdictions, this time period is 2021-2029).
- This statewide housing unit number (called the Regional Housing Needs Determination, or RHND), is divided into regions. Commerce is located within the Southern California Association of Governments (SCAG) region.
- SCAG is responsible for creating a methodology to distribute the RHND among all of its cities and counties. Each jurisdiction’s housing unit number is called the Regional Housing Needs Allocation (RHNA).
- The RHNA is the number of units that a jurisdiction must plan for in the Housing Element Update. The units are divided into four different categories based on median income: very low (earn <50 percent AMI), low (earn between 51 and 80 percent Area Median income (AMI)), moderate (earn between 81 and 120 percent AMI) and above moderate (earn more than 120 percent AMI).

#

As shown in Table 1 (2021-2029 Projected Housing Needs), the City of Commerce has an assigned RHNA allocation of 247 units for the 2021-2029 planning period. This allocation is distributed into four income categories (55 extremely/very low income, 22 low income, 39 moderate income, and 131 above moderate income units).

**Table 1  
2021-2029 Projected Housing Needs**

<b>Income Category (% of County AMI)</b>	<b>Number of Units</b>
Extremely Low/Very Low (50% or less)	55
Low (51-80% AMI)	22
Moderate (81-120% AMI)	39
Above Moderate (>121% AMI)	131
<b>Total</b>	<b>247</b>
<i>Source: SCAG 6<sup>th</sup> Cycle Final RHNA Allocation Plan, 7/1/2021</i> <i>* The City has a RHNA allocation of 55 very low income units (inclusive of extremely low income units). While the RHNA did not separately define housing needs for extremely low income households, the very low income allocation can be split evenly between very low- and extremely low income households.</i>	

The RHNA includes an equity adjustment that allocates future (construction) need by each income category in a way that meets the State mandate to reduce the overconcentration of lower income households in one community. For Commerce, because the City has lower median incomes compared to the region, Commerce has been allocated a larger proportion of above moderate income RHNA as

a balancing strategy. Per State law, local jurisdictions are also required to provide an estimate for their projected extremely low income households (those earning 30 percent or less AMI). Jurisdictions can use half of their very low income RHNA allocation to make this projection. Therefore, Commerce is dividing the very low income allocation of 55 units in half to meet this State requirement. (Reference: 1.5) While the Housing Element covers an eight-year planning period, starting on October 15, 2021, and ending on October 15, 2029, the RHNA projection period began on June 30, 2021. Therefore, projects that are under construction (but not yet completed), have received entitlement, been approved, under review, or with pending applications as of June 30, 2021 can be credited as progress toward the RHNA.

### **Progress toward RHNA**

State law requires that a community provide an adequate number of sites to allow for and facilitate production of the City’s regional share of housing. To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, the City must identify “adequate sites.” Under State law (California Government Code section 65583.c.1), adequate sites are those with appropriate zoning and development standards, with services and facilities, needed to facilitate and encourage the development of a variety of housing for all income levels. Land considered suitable for residential development includes the following:

- Vacant residentially zoned sites;
- Vacant non-residentially zoned sites that allow residential uses (such as mixed-use);
- Underutilized residentially zoned sites that are capable of being developed at a higher density or with greater intensity; and
- Non-residential zoned sites that can be redeveloped for, and/or rezoned for, residential use (via program actions).

The City of Commerce has a limited amount of undeveloped land, specifically limited residentially zoned land; consequently, the majority of the areas identified in the sites inventory are underutilized areas that allow for residential development and sites that could be up-zoned or rezoned to allow for residential development. Table 2 (RHNA Credits and Remaining Need) summarizes Commerce’s credits and the remaining housing need through October 15, 2029. As of May 2023, the City had issued permits for 31 new units and approved entitlement for 102 units. Along with 16 projected ADUs, the City has met all its RHNA for above moderate income units and a portion of its lower and moderate income units. The remaining RHNA is 105 units (52 extremely/very low income, 15 low income, and 38 moderate income units) that the City must identify adequate sites to allow for future development.

City-owned vacant and underutilized sites in existing residential zones can accommodate 29 additional units (6 very low income, 6 low income, and 17 moderate income units). The remaining 76 units (46 very low income, 9 low income, and 21 moderate income) can be accommodated on City-owned underutilized nonresidential sites where the City is proposing to redesignate as mixed use as part of the Comprehensive General Plan Update that is underway. Rezoning to implement the General Plan will follow within one year of the General Plan Update. The proposed land use densities for these mixed use designations ranges from 40 to 85 du/ac.

The rezoned sites will meet the requirements of Government Code 65583.2, including but not limited to a minimum density of 20 units per acre, minimum site size to permit at least 16 units on site, and zoned to allow ownership and rental housing by right in which at least 20 percent of the units are affordable to lower income households. As part of the rezoning, appropriate development standards (including but not limited to setbacks, lot coverage, height, and parking, among others) will be established to ensure

the allowable maximum density of each zone can be achieved. To further encourage and facilitate the development of affordable housing, the City will offer streamlined processing, fee modifications, density bonus incentives, reductions in development and parking standards, and funding, when available, for off-site improvements and any required environmental cleanup.

**Table 2  
RHNA Credits and Remaining Needs**

Unit Type	RHNA	Potential ADUs	Bldg. Permit Issued	Entitled	Remaining Need
Extremely Low (50% or less)	28	2	0	0	26
Very Low (31-50% AMI)	27	1	0	0	26
Low (51-80% AMI)	22	7	0	0	15
Moderate (81-120% AMI)	39	1	0	0	38
Above Moderate (>121% AMI)	131	5	31	102	0
<b>Total</b>	<b>247</b>	<b>16</b>	<b>31</b>	<b>102</b>	<b>105</b>

Projected Accessory Dwelling Units

Pursuant to State law, a city may credit potential ADUs to the RHNA requirements by using the trends in ADU construction to estimate new production. The City switched building permits systems in 2020 and is unable to recover records from the previous system. The City issued five building permits for ADUs in 2021 and two in 2022. Based on this data, the City conservatively assumes two ADUs annually in the eight-year planning period for a total of 16 ADUs. SCAG conducted a regional analysis of existing ADU rents in April and June 2020. The analysis broke down Los Angeles County into two survey areas. The City of Commerce is located within in the LA County II study area. The analysis resulted in affordability assumptions for jurisdictions in this study area, that allocated 15 percent to extremely low income, 8.5 percent to very low income, 44.6 percent, to low-income households, 2.1 percent to moderate-income, and 29.8 percent to above-moderate income households. Based on the ADU rent survey conducted by SCAG, of the 16 ADUs projected to be built, two units will be for extremely low income households, one unit for very low income households, seven for low income households, one for moderate income households and five units for above moderate income households.

Entitled Projects

In October 2020, the City of Commerce City Council approved the Rosewood Village project. A three-parcel project developed with various commercial and industrial uses. The sites are located in the Rosewood Village neighborhood, adjacent to City Hall. In April 2021, 31 building permits were issued for Site 1B, located at 5625 Jillson Street (Jillson Street and Valentina Way). These 31 attached townhomes are located near the Rosewood Park and Library. Site 1B is an asymmetrical-shaped lot approximately 1.33-acre in size. The site is flat and currently developed with a one and one-half story, 19,629-square-foot, light industrial, #warehouse and attached office building constructed in 1949. The site also includes an asphalt parking area, which is also used as a transitional storage area for miscellaneous household debris, and known as the Provisor Building. Three of the units will be reserved for workforce housing for middle income households (up to 175 percent AMI).

The other two Rosewood Village project sites are currently in the entitlement process. Site 1A (5550 Harbor Boulevard) is awaiting building permit issuance. This 1.98-acre site is approximately 1.98-acre is developed with a one and one-half story, 27,376-square-foot office building built in 1956, known as the North Annex along with an asphalt parking lot associated with the Aquatic Center. Plan check has

been completed for 37 attached single-family units. Three of these units will be reserved for workforce housing for middle income households (175 percent AMI).

Site 2 (5555 Jillson Street), a 2.43-acre lot, has transportation department office building, vehicle maintenance bays and a two-story parking structure with a ramp built in 1997. A total of 65 attached single-family units will be built on this site, with three of these units being reserved for workforce housing for middle income households (up to 175 percent AMI). This project is expected to submit for plan check review within one year of the proposed GPU.

Overall, the Rosewood Village development agreement commits to providing nine middle-income housing units. The City plans to use its funds to assist with downpayment assistance for income qualified households. However, because income level can exceed 120 percent AMI, these units are credited against the RHNA for above moderate income.

### Remaining RHNA

After accounting for ADUs, entitled projects, and projects under entitlement review, the remaining RHNA need is 105 units. HCD also recommends that jurisdictions identify enough residential capacity above and beyond the required housing numbers identified in lower income categories, to help offset sites that may (or may not) be developed during the planning period. Based on HCD guidance and review of other Housing Elements, a “buffer” or margin of safety of at least 15 percent above the City’s remaining RHNA allocation for the lower and moderate-income categories is reasonable. No Net Loss requires cities to demonstrate that capacity is available for affordable units throughout the 8-year planning period, including when a proposed development on a specific site result in fewer units than were assumed to be possible on that site in the Housing Element Sites Inventory (Government Code Section 65863, “No Net Loss” requirements). The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029. To accomplish this, the Residential Sites Inventory was developed and is described in further detail in the following section.

### **Residential Sites Inventory**

Housing elements are required to include a detailed land inventory and analysis of properties identifying sites that can be developed for housing within the planning period, noting zoning and general plan designations, size and existing uses; general analysis of environmental constraints and the availability of infrastructure, and the evaluation of the suitability, availability and realistic development capacity of sites. It is important to note that the capacity analysis is a planning exercise and does not mandate the elimination of existing use(s) or building(s) on a property unless the property owner so chooses. Instead, this analysis demonstrates that the City’s zoning and land use as applied to specific sites is adequate to accommodate possible units on specific sites. This “capacity analysis” is a strategy that looks at the community as it is today, applies the existing development rules, and calculates the resultant number of housing units that could reasonably and realistically be provided. The capacity analysis also considers the feasibility of redeveloping existing uses on site. For example, if uses are in decline, the site is underutilized compared to allowable intensity, and/or exhibiting trend of recycling to higher and better uses compared to other similar uses in the region.

“Default density” is a feature of state law and is a very important component of the methodology for the capacity analysis. The RHNA is divided into different income levels, as a jurisdiction needs to show its intent to provide housing for households of various income levels (SCAG determines the calculation methodology and number of units per income category). To assess this from a planning perspective, a “default density” is assigned to determine the number of units that could be counted in individual income categories. Generally speaking, the higher the potential density of a site, the more affordable the

resultant development is likely to be and the lower the income level it will be assigned to. Default density is, therefore, used for the purpose of assessing whether a jurisdiction can meet its RHNA, but actual development circumstances may vary.

The City assessed a number of sites that would be realistic candidates for infill residential development to fulfill the RHNA. The criteria developed to identify properties that had realistic development potential is based on environmental constraints (such as pollution), potential residential displacement and the City's existing land use, zoning, and development standards. See Appendix A for the list of criteria and details for identified sites. In addition, information obtained during the General Plan Update public outreach process was considered. Key take aways included:

- Commerce is behind in residential development
- Northwest and Bristow areas were identified as locations to have additional residential uses over time
- Denser residential development is a priority to provide more housing options
- Housing suitable for young adults wanting to move back to Commerce is needed
- Investigate sites for housing in the Veterans Park area for housing
- Need to provide housing for the local workforce

The 6th Cycle Sites Inventory for Commerce is made up to five site types:

- The approved Modelo Specific Plan;
- City-Owned Properties:
  - Vacant sites in existing residential zones
  - Underutilized sites in proposed mixed use rezone areas
- Non-City-Owned Properties
  - Vacant opportunity sites in existing residential zones;
  - Underutilized opportunity sites in proposed mixed use rezone areas

Appendix C of the Housing Element includes detailed information about each site.

### **Summary of RHNA Strategies**

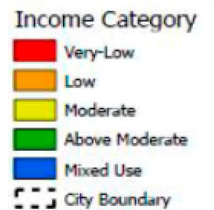
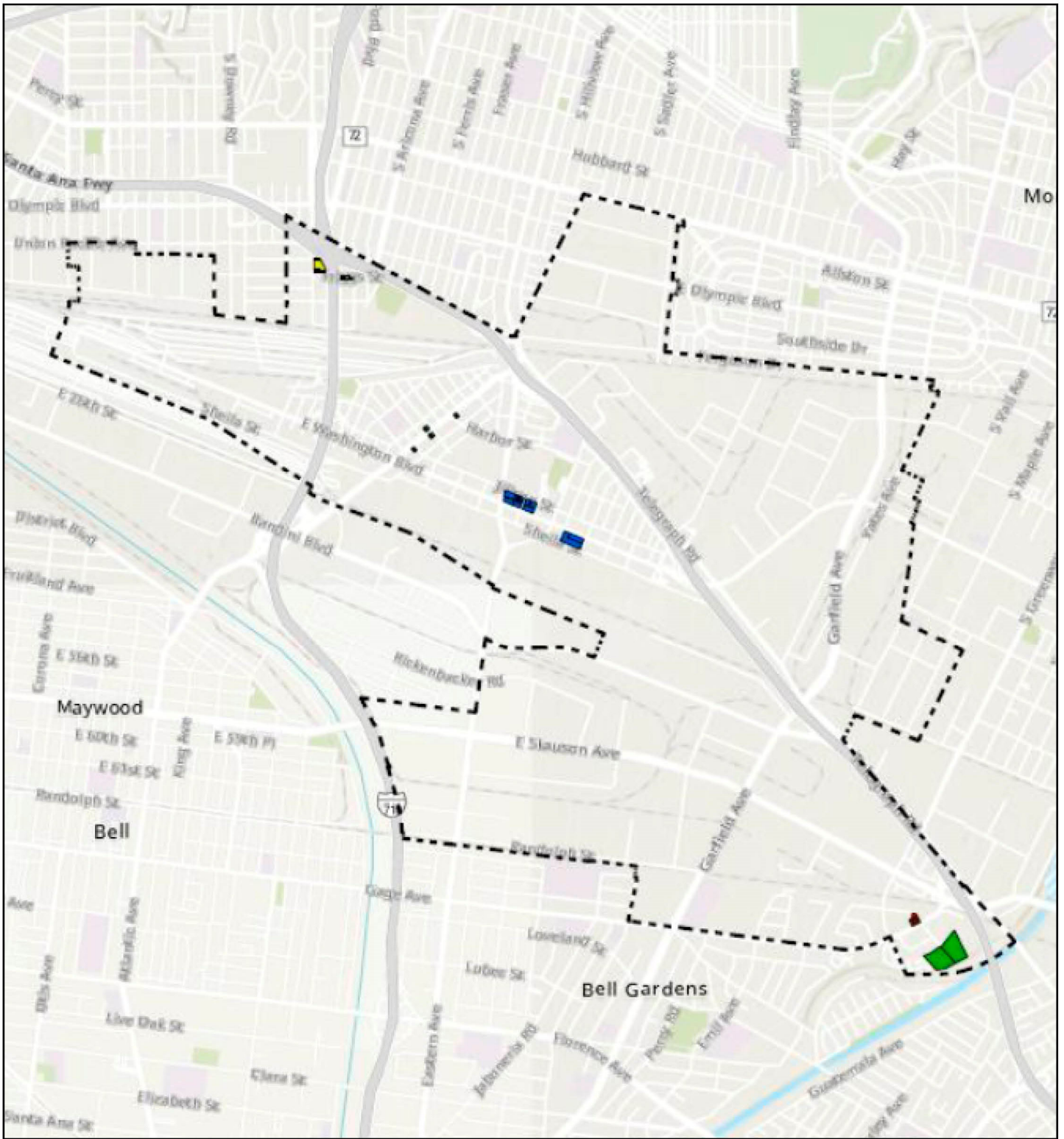
As shown in Table 3 (Summary of RHNA Strategies), the City is able to accommodate its RHNA, with a 52 percent buffer for the remaining very low income RHNA, a 407 percent buffer for the remaining low income RHNA and a 153 percent buffer for the remaining moderate income RHNA. Exhibit 2 (Commerce Sites Inventory by Income Category) shows the City's site inventory by income category.

**Table 3  
Summary of RHNA Strategies**

	<b>Extremely Low/Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>
<b>RHNA</b>	55	22	39	131	247
Potential ADUs*	3	7	1	5	16
Building Permits Issued (Site B of Rosewood Village)	0	0	0	31	31
Entitled (Site 1A and Site 2)	0	0	0	102	10
Total Credits	3	7	1	138	149
<b>Remaining RHNA Need</b>	52	15	38	0	105
Modelo Specific Plan	0	0	0	850	850
City-Owned Properties					
-Vacant Residential Sites	6	6	17	0	29
-Underutilized Mixed-Use Rezone Sites	73	70	19	78	300
Non-City-Owned Properties					
-Vacant Residential Opportunity Sites	0	0	0	5	5
-Underutilized Opportunity Mixed-Use Rezone Sites	0	0	0	34	34
<b>Total Units to Meet Remaining RHNA Need</b>	79	76	96	967	1,218
Surplus	27	61	58	967	1,113
% Buffer over Remaining Lower Income RHNA	52%	407%	153%	N/A	
<i>Note: *ADUs distributed according to the SCAG region recommended income distribution</i>					
<i>**Lower income units distributed proportionately between very low and low income based on RHNA allocation</i>					

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Source: City of Commerce  
<http://www.migcom.com> • 951-787-9222

## Exhibit 2 Commerce Sites Inventory by Income Category

Commerce 2021-2029 Housing Element Update  
 Commerce, California



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## **Affordable Housing Infrastructure and Resources**

As a completely urbanized community, the City of Commerce provides infrastructure throughout the City. All land designated for residential use is served by sewer and water lines, streets, storm drains, and telephone, electrical, and gas lines. However, improvements and expansions may be necessary to accommodate the land use intensification. The Model Specific Plan EIR addresses the infrastructure needed for the residential development in the plan area. SB 1087, effective January 2006, requires water and sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower income households. Pursuant to these statutes, upon adoption of its Housing Element, Commerce will immediately deliver the Element to local water and sewer providers, along with a summary of its regional housing needs allocation.

### Financial Resources

A variety of potential funding sources is available for housing activities in Commerce. Due to both the high cost of developing and preserving housing, and limitations on both the amount and uses of funds earmarked, a variety of funding sources may be required. Potential funding sources available for housing activities include: federal, state, county, local, and private resources.

### Administrative Resources

Several active non-profit agencies have completed projects in Los Angeles County. These agencies serve as resources in meeting Commerce's housing needs, and are integral in implementing activities for acquisition/rehabilitation, preservation of assisted housing, and development of affordable housing. The City's current Housing Plan is a program to partner with affordable housing developers, including National CORE, Habitat for Humanity, Jamboree Housing Corporation (JHC), and Mercy Housing California.

### City of Commerce Planning Division

The Planning Division's primary responsibility is the long-range planning and physical development of the City to promote livability and appearance. The division ensures the City's viability through enforcement of land use, construction, health, safety, and environmental regulations. This involves land use and development standards, building codes, economic vitality, and adherence to the General Plan. It is also responsible for the administration of the General Plan and implementation of the Zoning Ordinance and Specific Plans.

## **Housing Constraints**

The Housing Element's constraints section analyzes barriers that may hinder the City's ability to achieve its housing objectives or to obtain the necessary resources to assist in the production, maintenance and improvement of the overall housing stock. A number of different dynamics that include governmental, market, infrastructure, and environmental factors may constrain the provision of adequate and affordable housing in a city. Consequently, State law requires that housing elements analyze potential and actual governmental and non-governmental constraints to the production, maintenance, and improvement of housing for persons of all income levels and disabilities. In instances where barriers exist, State law requires the local jurisdiction demonstrate efforts to remove, where appropriate and legally possible, governmental constraints hindering the achievement of housing goals.

### Environmental Constraints

No known earthquake faults traverse Commerce, and the area is not exposed to natural environmental hazards such as flooding, slope erosion, and landslides. Commerce lies within the dam inundation area of the Garvey Reservoir in Monterey Park. Dam rupture could result in the flooding of areas between Eastern Avenue and Garfield Avenue. The Ferguson neighborhood and portions of the Rosewood

neighborhood could be affected by the flooding. Residential land uses are sensitive to loud noises. State noise guidelines recommend that residential development be located in areas exposed to ambient outdoor noise levels no greater than 65 A-weighted decibels (dBA). A citywide noise inventory performed in October 2005, found that virtually all of the neighborhoods in Commerce are located in areas where noise levels exceed 65 dBA. The noise environment is not expected to significantly change over time since the primary factors contributing to noise - the I-5 and I-710 Freeways, the railway freight lines, the railroad yard, and local truck traffic will have a continued presence in the City.

### Market Constraints

Production cost factors such as land acquisition and improvement, construction material and labor, financing, overhead costs, and fees, are market constraints that impact housing affordability. The cost of housing in Commerce has increased in the last few years as land values, construction costs, and finance charges continue to increase. The diminishing supply of land available for residential construction has driven land and housing costs upward. The City has little control over the market fluctuations that affect housing costs. An inventory of local lending institutions revealed that loans are available in the area to qualified clients. Creative financing is also available and encouraged by the banks, especially for the first-time buyer or developer. The interest rates, points, and other costs are very similar to those of the surrounding cities. Residential vacancy rates and the location of the City within the Los Angeles basin are two market constraints that affect the affordability of housing. As Los Angeles development areas continue to expand, Commerce is becoming an increasingly convenient area in which to live. Housing prices will continue to rise due to this demand. As previously mentioned, just over 2% of the housing stock within the City is vacant. This translates into a demand for housing in the region exceeding the available supply, which inflates both the rental and ownership housing prices. If land values, construction costs, and interest rates increase over time, the cost of all new housing will rise accordingly. In recent years the lowering of interest rates and housing costs has led to more residents qualifying for home loans.

A city has no control over the market fluctuations that may affect housing costs because market conditions result from a complex interplay of national economic policies and general economic conditions. The Commerce Community Development Commission, however, has implemented projects and programs designed to encourage new construction and promote housing rehabilitation even during periods of a sluggish economy. Increases in the cost of goods (primarily housing) due to inflation means that many families may find themselves unable to afford suitable housing. The lack of sufficient income may lead to an increase in the number of working people sharing the cost of a home. As a result, overcrowding is common and the housing choice for many families is severely restricted. This situation is further aggravated in periods of high unemployment. Racial and economic discrimination also has a direct effect on housing opportunity and results in the concentration of minority and lower income households. Redlining practices (the practice of ‘grading’ neighborhoods based on condition, age, and residential makeup) have not been observed, as the housing market is not characterized by wide disparities in prices. The Long Beach Fair Housing Foundation monitors redlining practices in the Southern California region, including the City of Commerce, and has found that redlining practices do not appear to be a problem in Commerce.

### Governmental Constraints

Governmental constraints include policies, development regulations, standards, fees or other actions that impose limitations by various levels of government upon land and housing ownership and development. Local land use controls can include site improvement requirements, fees and exactions, permit processing procedures, and other factors that may constrain the maintenance, development, and improvement of housing. At the local level, government-housing regulations are necessary to assure: (1) that housing is constructed and maintained in a safe manner, (2) that the density and design of housing is consistent with community standards, and (3) that adequate infrastructure to support new

housing is provided. While local policies are necessary to ensure a quality housing stock, these regulations can also affect the price and availability of housing and, in particular, the availability of affordable housing. Key development standards that could add to the cost of housing development and the City's response include the following:

- The City has adopted the Los Angeles County Building Code by reference that establishes minimum construction standards. The City's existing development requirements included in the Zoning Ordinance and Building Code do not include any architectural standards that would add to the cost of new housing development. The City also relies on Los Angeles County to provide plan check services. In addition, there are no unique open space, parking, or Mello-Roos fee requirements that are applicable to new developments.
- Code Enforcement site visits are typically complaint driven. The City of Commerce also maintains a number of programs that property owners may take advantage of if their unit is found to be substandard. Code Enforcement officers have been very proactive in referring residential property owners to these programs.
- All of the residential areas where the residential zoning is applicable are well served by streets and other infrastructure. No street dedications or new infrastructure is required for the typical infill development. The City's Housing Overlay Zone permits new residential development within an area that is currently developed as industrial. As a result, new internal roadways will be required to accommodate the future housing.
- The California Energy Resources Conservation and Development Commission developed guidelines used by building code enforcement officials to implement energy conservation regulations established by the California Energy Commission. While serving as a mitigation tool to help reduce electricity and natural gas consumption, they add to the cost of housing. State law also authorizes school districts to collect impact fees for all new residential, commercial, and industrial construction.
- The City of Commerce Zoning Ordinance includes development standards and requirements for existing and potential development within the R-1, R-2, and R-3 zone districts. The development standards do not appear to represent a constraint to development given the amount of rehabilitation that has occurred in recent years. The minimum lot size and setback requirements are very liberal. For example, most communities in the area require between 5 to 10 feet for the side yard setbacks. This Housing Element includes The Removal of Governmental Constraints Program that will involve a review of the Zoning Ordinance to remove or modify other development standards and/or requirements that may represent a governmental constraint to housing development.

State and federal regulations, which are beyond local jurisdiction control, can also add to governmental constraints. Regulations related to environmental protection, building codes, and other topics have significant, often adverse, impacts on housing costs and availability. Although federal and state agencies play a role in the imposition of governmental constraints, the actions of these agencies are, for the most part, beyond the influence of local government and are therefore not addressed in this document. Therefore, this section of the Housing Element emphasizes policies and regulations that can be mitigated by the City.

## Housing Plan and Objectives

For the City of Commerce the enduring objective is to facilitate and encourage housing that fulfills the diverse needs of the community. To achieve this goal the Housing Plan identifies long-term housing goals and shorter-term policies to address the identified housing needs. The goals and policies are then implemented through a series of housing programs. Programs identify specific actions the City plans to undertake toward achieving each goal and policy. The goals, policies, and programs within the Housing Plan build upon the identified housing needs in the community, constraints confronting the City, and resources available to address the housing needs. This Plan will guide City housing policy through the 2021- 2029 planning period. Commerce’s housing goals, policies, and programs address the following five major areas:

1. Identification of adequate sites to achieve a variety and diversity of housing;
2. Increased opportunities for a variety of housing types for all income groups;
3. Removal of constraints to the construction of affordable housing;
4. Conservation of the City’s existing housing stock; and
5. Affirmatively furthering fair housing.

### **Goal 1: Identify Adequate Sites to Achieve Housing Variety**

Meeting the housing needs of all residents of the community requires the identification of adequate sites to accommodate a variety of housing types. The City will assure that adequate residentially-zoned and mixed-use sites are available to accommodate the 2021-2029 RHNA allocation.

Policy 1.1: Provide a range of residential development types in Commerce, including low density single-family homes, moderate density townhomes, higher density multifamily units, and residential/commercial mixed use in order to address the City’s share of regional housing needs.

Policy 1.2: Provide incentives to facilitate the development of housing options for households with special needs.

### **Goal 2 Provide a variety of housing types to accommodate all economic segments of the community**

Commerce strives to achieve a balanced community, with housing units available for all income segments of the population. The existing housing stock offers many affordable options throughout the City. The intent of this goal is to assist in the provision of adequate housing to meet the needs of the community, including the needs of both renter- and owner-households.

Policy 2.1: Continue to participate in State and federally sponsored programs designed to maintain housing affordability.

Policy 2.2: Explore opportunities for new residential development within those areas of the City occupied by vacant, obsolete commercial and industrial uses.

Policy 2.3: Continue to provide development incentives, when possible, to support nonprofit and for-profit organizations in their efforts to construct, acquire, and improve affordable housing.

Policy 2.4: Facilitate development of special needs and low income housing through use of financial and/or regulatory incentives.

Policy 2.5: Ensure that potential sites for residential development, located in those areas that were previously occupied by nonresidential land uses, are investigated to determine whether or not previous on-site uses present potential health risks.

**Goal 3 Minimize the impact of governmental constraints on housing production and affordability**

Market, environmental, and governmental factors pose constraints to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower and moderate-income households due to their limited resources for absorbing the costs. The City is committed to removing governmental constraints that hinder the production of housing, streamlining permitting process to facilitate efficient entitlement and building permit processing, and offering incentives to mitigate market constraints.

Policy 3.1: Support innovative public, private and non-profit efforts toward the development of affordable housing.

Policy 3.2: Periodically review and revise the City’s development standards, if necessary, to facilitate quality housing that is affordable to all income levels.

Policy 3.3: When feasible, consider reducing, subsidizing, or deferring development fees to facilitate the provision of affordable housing.

Policy 3.4: Continue the provision of incentives, including density bonus, which encourages developers to include affordable units in their projects.

Policy 3.5: Facilitate accessory dwelling units on single-family parcels as a means of providing additional infill housing opportunities.

**Goal 4 Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce**

Continued maintenance and preservation of the existing housing stock in Commerce is crucial to ensure quality neighborhoods. Housing programs focused on the achievement of this goal include rehabilitation of single- and multi-family housing units, code enforcement, and efforts to preserve assisted housing units at risk of converting to market-rate housing. Through code enforcement, neighborhood, and home improvement programs, the City is able to maintain the condition of existing housing units.

Policy 4.1: Promote, maintain, and enhance the character and identity of the City’s residential neighborhoods through adequate code enforcement.

Policy 4.2: Provide financial assistance, when available, to rehabilitate dwelling units owned or occupied by special needs and lower income households.

Policy 4.3: Encourage property owners to rehabilitate substandard residential units and maintain their properties to the greatest extent possible.

Policy 4.4: Promote increased awareness among property owners and residents of the importance of property maintenance to long-term affordable housing.

## 2 – Project Description

- Policy 4.5: Design new higher-density residential projects at a scale (number of units, height, etc.) that is compatible in design with adjacent residential areas.
- Policy 4.6: Cooperate with non-profit housing providers in the acquisition, rehabilitation, and maintenance of older apartment complexes, single-family houses and hotel/motels to be preserved as long-term affordable housing.
- Policy 4.7: Monitor affordable housing developments, accessory dwelling units, and vacant units within the City, and work to preserve existing affordable housing that is considered at risk of converting to market-level rents.

### **Goal 5 Affirmatively further fair housing**

Ensure equal housing opportunity for all, regardless of their special characteristics as protected by local, state, and federal fair housing laws.

- Policy 5.1: Comply with federal, state, and local Fair Housing and anti-discrimination laws, and affirmatively further fair housing for all, ensuring equal access to housing regardless of their special circumstances as protected by fair housing laws.
- Policy 5.2: Promote housing mobility by expanding housing choices and increasing housing opportunities in higher resource areas.
- Policy 5.3: Protect tenants from discriminatory housing practices and displacement.
- Policy 5.4: Promote the integration of affordable and special needs housing projects in existing neighborhoods.
- Policy 5.5: Collaborate with and support efforts of organizations dedicated to eliminating housing discrimination.

### **2.11 – Environmental Setting**

Commerce is located in Los Angeles County approximately six miles southeast of downtown Los Angeles. The Santa Ana Freeway (Interstate 5) and the Long Beach Freeway (Interstate 710) provides Commerce with its principal regional access. Primary arterials providing sub-regional access to Commerce include Bandini Boulevard, Eastern Avenue, Washington Boulevard, Atlantic Boulevard, Slauson Boulevard, and Garfield Avenue. Commerce is completely urbanized and does not encompass any native vegetation or habitat. The Los Angeles River is located to the west of the City and the San Gabriel River is located to the east; both are channelized.

Single-family residential neighborhoods generally surround the northern portion of the City. Commercial development is located on Whittier Boulevard, near Interstate 5 (Santa Ana Freeway), and on South Indiana Street. Development to the east is characterized by industrial uses and scattered commercial operations. Single-family residential dwelling units characterize land uses abutting the southern boundary of the City. A portion of the Los Angeles River, the Hobart railyard, and industrial development is located to the west.



## **2.12 – Required Approvals**

The City Council must approve a General Plan Amendment that incorporates the 2021-2029 Housing Element into the current General Plan.

## **2.13 – Other Public Agencies Whose Approval is Required**

The State of California, Department of Housing and Community Development will review the Housing Element for compliance with State law and indicate whether the adopted Element is certified (Article 10.6 of the Government Code).

### References

- 1.1 City of Commerce. General Information and Statistics.  
<http://www.ci.commerce.ca.us/general.htm> [Accessed November 2023]
- 1.2 City of Commerce. General Plan. January 2008
- 1.3 City of Commerce. Zoning Code.
- 1.4 State of California. Government Code.
- 1.5 Southern California Association of Governments. Regional Housing Needs Assessment. 2007

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## 3 Determination

### 3.1 – Environmental Factors Potentially Affected

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

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology /Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards & Hazardous Materials
<input type="checkbox"/>	Hydrology / Water Quality	<input type="checkbox"/>	Land Use / Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population / Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation/Traffic	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities / Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

### 3.2 – Determination

<input checked="" type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Name: Louis Morales, Interim Director

Date

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## 4 Evaluation of Environmental Impacts

### 4.1 – Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

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

**a) Less than Significant Impact.** Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). The City’s General Plan Resource Management Element does not identify any scenic vistas within the City or within view of the City. The proposed Housing Element Update does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur; thus, programmatic impacts associated with potential development of the Inventory Sites would remain within the scope of analysis certified in the General Plan EIR. Future development under the updated Housing Element would not substantially change the location, distribution, or overall density of development within the City other than for the Inventory Sites. Future development of the Inventory Sites would be subject to project-specific environmental review pursuant CEQA, as applicable, and would be required to comply with the City’s Zoning Code restrictions on building height and design as well as General Plan policies that address

visual and aesthetic impacts of future development. Considering that the General Plan EIR analyzed impacts to scenic vistas and impacts were found to be less than significant with implementation of policies and programs included in the General Plan, and that the proposed Housing Element Update in and of itself would not result in greater impacts than previously contemplated in the General Plan EIR, its programmatic impacts would be less than significant and no mitigation is required.

**b) No Impact.** The City of Commerce is not located adjacent to a designated State scenic highway or eligible State scenic highway, as identified on the California Scenic Highway Mapping System.<sup>1</sup> The City is a fully developed, urbanized area that contains no scenic resources. Therefore, no impact to scenic resources visible from a State scenic highway would occur as a result of the proposed Housing Element Update.

**c) Less than Significant Impact.** Degradation of visual character or quality is defined by substantial changes to the existing site appearance through construction of structures such that they are poorly designed or conflict with the site's existing surroundings. The proposed Housing Element Update does not include approval of any development projects or any physical alterations to the planning area. Additionally, as discussed above, future development under the proposed Housing Element would be required to comply with the City's Zoning Code design standards as well as General Plan policies that address visual and aesthetic impacts of future development. Therefore, a less than significant impact would occur.

**d) No Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Because no physical alterations are proposed as part of the Housing Element Update, no new sources of lighting or glare will be introduced in the planning area. Additionally, future development under the Housing Element Update would be required to comply with the City's Zoning Code design standards as well as General Plan policies that address visual and aesthetic impacts of future developments. Therefore, the update would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. No impact would occur.

## 4.2 – Agriculture and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) No Impact.** Due to its urban setting, the planning area and its surroundings are not included in the Farmland Mapping and Monitoring Program of the California Department of Conservation and the planning area is not zoned for agricultural use and is not under a Williamson Act Contract.<sup>2, 3</sup> In addition, there are no areas of forestland as defined in Public Resources Code Section 12220(g) or timberland as defined in Public Resources Code Section 4526 within the City of Commerce. The proposed Housing Element Update does not include approval of any development projects or any physical alterations to the planning area. Therefore, the proposed project would not change the existing environment in a manner that would result in the conversion of farmland or forestland to other kinds of land uses. No impact would occur.
- b) No Impact.** Williamson Act contracts are formed between a county or city and a landowner for the purposes of restricting specific parcels of land to agricultural preserve areas. The planning area does not contain any agricultural uses nor are there any areas zoned for agricultural uses within the City. No active Williamson Act contracts pertain to the planning area. Therefore, no impact would occur.
- c) No Impact.** The planning area is a completely urbanized area with no timberland resources. In addition, the City's General Plan does not allow for forest land or timberland production. Therefore, the proposed Housing Element Update would not conflict with existing zoning or cause rezoning of forest land. No impact would occur.
- d) No Impact.** As previously discussed, no forest lands occur within the City of Commerce. Therefore, the proposed Housing Element Update would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.
- e) No Impact.** No agricultural or farmland occurs within the planning area, and no forest lands, farmland, or agricultural uses are allowed. Therefore, the proposed Housing Element Update would not involve changes in the existing environment that would result in conversion of farmland to non-agricultural use or the conversion of forest lands to non-forest use. No impact would occur.



### 4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Less than Significant Impact.** The City of Commerce is located within the South Coast Air Basin (Basin) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD and the Southern California Association of Governments (SCAG) are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the Basin. The AQMP is a series of plans for the purpose of reaching short-and long-term goals for those pollutants for which the Basin is designated as a “nonattainment” area because it does not meet federal and/or state Ambient Air Quality Standards (AAQS). To determine consistency between a project and the AQMP, the project must comply with all applicable SCAQMD rules and regulations, comply with all proposed or adopted control measures, and be consistent with the growth forecasts utilized in preparation of the Plan. A significant impact could occur if the proposed Housing Element Update conflicts with or obstructs implementation of the South Coast Air Basin 2016 AQMP. Conflicts and obstructions that hinder implementation of the AQMP can delay efforts to meet attainment deadlines for criteria pollutants and maintaining existing compliance with applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD CEQA Air Quality Handbook, consistency with the South Coast Air Basin 2016 AQMP is affirmed when a project meets the following:

1. Does not increase the frequency or severity of an air quality standards violation or cause a new violation; and,
2. Is consistent with the growth assumptions in the AQMP.

As discussed in section 4.3 (b) below, the proposed Housing Element Update would not increase the frequency or severity of an air quality standards violation. Additionally, the proposed project does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur; thus, programmatic impacts associated with potential development of the Inventory Sites would remain within the scope of analysis certified in the General Plan EIR. Future development of the Inventory Sites would be subject to project-specific environmental review pursuant to CEQA, as applicable, and would be required to comply with the City's Zoning Code design guidelines as well as implement General Plan policies that address air quality impacts of future development. Future development under the updated Housing Element will not substantially change the location, distribution, or overall density of development within the City other than for the Inventory Sites. Considering that the General Plan EIR analyzed air quality impacts and impacts were found to be less than significant with implementation of General Plan policies and programs, and that the proposed project in and of itself would not result in greater impacts than previously contemplated in the General Plan EIR, the proposed Housing Element Update's programmatic impacts would be less than significant and no mitigation is required. Subsequent to this Housing Element Update, the City will be undertaking focused General Plan and zoning ordinance amendments to ensure sufficient land use capacity is available to accommodate the RHNA. This Initial Study examines the potential environmental impacts at a program level for only the Housing Element since the Housing Element itself does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur. Therefore, based on Criteria 1 and 2 programmatic impacts from implementation of the proposed Housing Element related to AQMP consistency will be less than significant and no mitigation is required.

**b) Less Than Significant Impact.** A project may have a significant impact if project-related emissions will exceed federal, state, or regional standards or thresholds, or if project-related emissions will substantially contribute to existing or project air quality violations. The City of Commerce is located within the South Coast Air Basin. Efforts to attain state or federal air quality standards are governed by the SCAQMD. Both the state and federal governments have established health based ambient air quality standards (AAQS). The SCAQMD has prepared the AQMP to set forth a comprehensive and integrated program that would lead the Basin into compliance with the federal 24-hour  $PM_{2.5}$  (particulate matter less than 2.5 microns in size) air quality standard and to provide an update to the SCAQMD's commitments toward meeting the federal 8-hour ozone standards. The Basin is currently in non-attainment for state, federal criteria pollutants ozone, nitrogen dioxide, and fine particulate matter ( $PM_{2.5}$  and  $PM_{10}$ ).<sup>4</sup>

### **Construction Emissions**

The proposed Housing Element Update does include approval of any development projects and does not include any physical alterations to the planning area. As such, the project would not result in any construction-related criteria pollutant emissions and would not exceed any daily thresholds established by SCAQMD.

### **Operational Emissions**

The effects of future housing development on regional air quality could result in potentially significant impacts on the health of residents if it is determined that a project's individual contribution to cumulative air pollution levels is considerable by exceeding the annual emissions thresholds established by the SCAQMD in its *CEQA Air Quality Analysis Handbook* (SCAQMD 1993) and, furthermore, would be determined to potentially conflict with implementation of the AQMP. The Commerce General Plan contains the following policies related to air quality:

**Air Quality Policy 1.1.** The City of Commerce will consider environmental justice issues as they are related to potential health impacts associated with air pollution and ensure that all land use decisions, including enforcement actions, are made in an equitable fashion to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location from the health effects of air pollution.

**Air Quality Policy 1.2.** The City of Commerce will encourage the applicants for sensitive land uses (e.g., residences, schools, daycare centers, playgrounds and medical facilities) to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential impacts of air pollution on sensitive receptors.

**Air Quality Policy 1.3.** The City of Commerce will promote and support mixed-use land patterns that allow the integration of retail, office, institutional and residential uses. Consult with the AQMD when siting new facilities with dust, odors or TAC emissions to avoid siting those facilities near sensitive receptors and avoid siting sensitive receptors near sources of air pollution.

**Air Quality Policy 1.4.** The City of Commerce will facilitate communication among residents, businesses and the AQMD to quickly resolve air pollution nuisance complaints. Distribute information to advise residents on how to register a complaint with the SCAQMD.

**Air Quality Policy 1.5.** The City of Commerce will require that owners of new developments that have the potential to emit air pollutants that would impact sensitive receptors to notify residents and businesses adjacent to the proposed site prior to starting construction.

**Air Quality Policy 1.6.** The City of Commerce will consider all feasible alternatives to minimize emissions from diesel equipment (e.g., trucks, construction equipment, and generators).

**Air Quality Policy 1.7.** The City of Commerce will actively participate in decisions on the siting or expansion of facilities or land uses (e.g. freeway expansions), to ensure the inclusion of air quality.

**Air Quality Policy 2.1.** The City of Commerce will require that developers of high density and mixed-use developments consult with the local transit agency and incorporate all appropriate and feasible transit amenities into the plans.

**Air Quality Policy 2.2.** The City of Commerce will establish a Mixed-Use Zoning District that offers incentives to mixed-use developments. The Mixed-Use designation that is applicable to the Atlantic Boulevard corridor implements this policy.

**Air Quality Policy 2.3.** The City of Commerce will adopt and implement codes that encourage community centers, telecommuting programs, and home-based businesses.

**Air Quality Policy 2.4.** The City of Commerce will create opportunities to receive State transportation funds by adopting incentives (e.g., an expedited review process) for planning and implementing infill development projects within urbanized areas that include job centers and clean transportation nodes (e.g., preparation of "transit village" plans).

**Air Quality Policy 2.5.** The City of Commerce will collaborate with local, regional, state and federal agencies to create incentives for "job/housing opportunity zones," to promote housing in job-rich areas and jobs in housing-rich areas. The Housing Opportunity areas identified in the Community Development Element are consistent with this policy.

**Air Quality Policy 2.6.** The City of Commerce will design safe and efficient vehicle access to commercial land uses from arterial streets to ensure efficient vehicular ingress and egress.

**Air Quality Policy 2.7.** The City of Commerce will promote mass transit ridership through careful planning of routes, headways, origins and destinations, and types of vehicles.

**Air Quality Policy 2.8.** The City of Commerce will seek new cooperative relationships between employers and employees to reduce vehicle miles traveled (VMT).

**Air Quality Policy 2.9.** The City of Commerce will work with large employers and commercial/industrial complexes to create Transportation Management Associations and to implement trip/VMT action strategies.

**Air Quality Policy 2.10.** The City of Commerce will cooperate with surrounding jurisdictions to provide incentives, adopt regulations and develop transportation demand management programs reduce and eliminate vehicle trips and VMT.

**Air Quality Policy 2.11.** The City of Commerce will collaborate with local transit agencies to develop programs and educate employers about employee rideshare and transit.

**Air Quality Policy 2.12.** The City of Commerce will identify and develop non-motorized transportation corridors (e.g., bicycling and pedestrian trails and lanes).

**Air Quality Policy 2.13.** The City of Commerce will establish requirements for special event centers to provide off-site parking and park-n-ride facilities at remote locations. Remote parking should be as close as practicable to the event site and the operator should operate or provide alternative-fuel vehicles for shuttles.

**Air Quality Policy 2.14.** The City of Commerce will encourage special event center operators to provide discounted transit passes with event tickets or offer discounted on-site parking for carpooling patrons (four or more persons per vehicle).

**Air Quality Policy 3.1.** The City of Commerce will manage the City's transportation fleet fueling standards to achieve the greatest number of alternative fuel vehicles in the City fleet.

**Air Quality Policy 3.2.** The City of Commerce will support the development of alternative fuel infrastructure that is publicly accessible.

**Air Quality Policy 3.3.** The City of Commerce will establish programs for priority or free parking on City streets or in City parking lots for alternative fuel vehicles.

**Air Quality Policy 3.4.** The City of Commerce will cooperate with federal and state agencies and the AQMD in their efforts to reduce exposure from railroad and truck emissions.

**Air Quality Policy 3.5.** The City of Commerce will collaborate with the USEPA, CARIB, AQMD, and warehouse owners to create programs and ordinances to minimize the amount of diesel emissions related to warehousing operations.

**Air Quality Policy 3.6.** The City of Commerce will manage the City's transportation fleet fueling standards to achieve the greatest number of alternative fuel vehicles in the City fleet.

**Air Quality Policy 3.7.** The City of Commerce will support the development of alternative fuel infrastructure that is publicly accessible.

**Air Quality Policy 4.1.** The City of Commerce will synchronize traffic signals throughout the City and with adjoining cities and counties while allowing free flow of mass transit systems.

**Air Quality Policy 4.2.** The City of Commerce will reduce traffic delays through highway maintenance, rapid emergency response, debris removal, and elimination of at-grade railroad crossings.

**Air Quality Policy 4.3.** The City of Commerce will encourage businesses to schedule deliveries at off-peak traffic periods through the land use entitlement or business regulation process.

**Air Quality Policy 4.4.** The City of Commerce will encourage the construction of HOV lanes whenever necessary to relieve congestion and reduce air pollution. Emphasize the use of HOV lanes, as well as light rail and bus routes, and pedestrian and bicycle facilities to improve mobility and air quality.

**Air Quality Policy 4.5.** The City of Commerce will monitor traffic and congestion to determine when and where the City needs new transportation facilities to achieve increased mobility efficiency.

**Air Quality Policy 4.6.** The City of Commerce will work with local transit providers to incorporate best design practices for transit into new development projects.

**Air Quality Policy 4.7.** The City of Commerce will continue to implement the required components of the Congestion Management Plan (CMP), and continue to work with Los Angeles County on annual updates to the CMP.

**Air Quality Policy 4.8.** The City of Commerce will support SCAG's Regional Growth Management Plan by developing intergovernmental agreements with appropriate governmental entities such as the Gateway Cities, sanitation districts, water districts, and those sub-regional entities identified in the Regional Growth Management Plan.

**Air Quality Policy 5.1.** The City of Commerce will ensure that all future public facilities and improvements do not have a significant adverse air quality impact on the community and that any such impacts must be mitigated to the fullest extent possible.

**Air Quality Policy 5.2.** The City of Commerce will oppose the over-concentration of polluting public facilities and improvements.

**Air Quality Policy 5.3.** The City of Commerce will take a proactive role in meeting with regional planning agencies to ensure that the local community's voice is heard in air quality issues.

The General Plan EIR concluded that growth within the City, consistent with the General Plan, would have less than significant air quality impacts with implementation of policies and programs included in the General Plan. Subsequent to this Housing Element Update, the City would be undertaking focused General Plan and zoning ordinance amendments to ensure sufficient land use capacity is available to accommodate the RHNA. This Initial Study examines the potential environmental impacts at a program level for only the Housing Element since the Housing Element itself does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur. Therefore, the proposed HEU is consistent with the findings of the General Plan EIR, would not create a new or significantly increased impact, and would not require additional mitigation at this programmatic level.

Future housing developed in accordance with the goals and policies of the Housing Element would have the effect of contributing incrementally to the mobile, energy, and area sources that cumulatively contribute to criteria pollutant levels and associated air pollution in the Basin. The SCAQMD is responsible for preparing the Air Quality Management Plan (AQMP) for the Basin (SCAQMD 2016). The AQMP includes strategies and control measures to reduce and/or maintain the effects that construction and operation of various uses within the Basin have on regional air quality. The effects of future housing development on regional air quality could result in potentially significant impacts on the health of residents if it is determined that a project's individual contribution to cumulative air pollution levels is considerable by exceeding the annual emissions thresholds established by the SCAQMD in its *CEQA Air Quality Analysis Handbook* (SCAQMD 1993) and, furthermore, would be determined to potentially conflict with implementation of the AQMP. Criteria pollutants can directly damage the environment, both natural and man-made. Impacts to human health include a variety of acute and chronic respiratory illnesses. Development of future housing would be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA upon application for entitlement permits. Development projects found to be exempt from CEQA would not have a significant impact on the environment as declared by state legislation. Other projects would be subject to standard analysis and site-specific mitigation if required.

The General Plan EIR concluded that build out of the General Plan would be consistent with the air district's air quality management plans and would not result in substantial increases in criteria pollutant emissions within the air basin. The proposed Housing Element Update does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long term air quality impacts in the City have already been contemplated, and the proposed project would not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites would be subject to the Goals and Policies of the General Plan and would be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA. Therefore, impacts related to implementation of the proposed Housing Element Update would be less than significant and no mitigation is required.

**c) No Impact.** Sensitive receptors include uses occupied by children or the elderly such as hospitals, parks, schools, and residential homes. As previously stated, the Housing Element Update does not include approval of any development projects. In addition, future housing developments would not emit pollutants during operation. Because there would be no construction-related emissions, operational emissions would not exceed any SCAQMD daily threshold (see section 4.3 (b) above), and because the project would not result in the emission of any pollutants, no impact would occur.

**d) No Impact.** According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations such as manufacturing uses that produce chemicals, and paper. Odors are associated with industrial projects including the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing process, as well as sewage treatment facilities and landfills. The proposed Housing Element Update would not include any of the above noted uses or processes. Therefore, no impact would occur.

### 4.4 – Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**a) Less than Significant Impact.** According to the General Plan EIR, the City does not contain any listed or sensitive species of plants or animals, or critical habitat for any such species. While the City does contain a number of drainage/flood control channels, they contain little or no riparian (streamside) or wetland resources subject to the jurisdiction of various federal or state agencies (U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, Regional Water Quality Control Board, or California Department of Fish and Wildlife). The General Plan also indicates there is little or no potential for these species or other important biological resources to be present within the City. The City has been largely developed for many years so no populations of rare or sensitive species are known to occur within the City limits. Due to the level of disturbance within the City, no sensitive plant species are expected to be encountered, and vegetation is primarily ruderal (weedy). Wildlife expected within the City would be non-sensitive wildlife that generally inhabit disturbed urban areas (such as racoons, squirrels, coyotes, rats, common bird species, etc.). All listed or otherwise sensitive species have low or no potential to occur within the City due to the marginal suitable habitat available or lack of habitat. In addition, the General Plan requires that biological studies be prepared when necessary to assess habitat value, implementation of mitigation, and coordination with agencies and individuals with expertise in biological resources.

Following the adoption of the proposed Housing Element Update, the City will amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The Housing Element itself does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur; thus, programmatic impacts associated with potential development of the Inventory Sites would remain within the scope of analysis certified in the General Plan EIR. As applicable, future development of the Inventory Sites would be subject to site-specific environmental review pursuant to CEQA. Considering that the General Plan EIR analyzed impacts to sensitive species and impacts were found to be less than significant with implementation of General Plan policies and programs, and that the proposed project in and of itself would not result in greater impacts than previously contemplated in the General Plan EIR, the proposed Housing Element’s programmatic impacts would be less than significant and no mitigation is required.

**b) No Impact.** A significant impact would occur if the proposed Housing Element Update would have a substantial adverse effect on any riparian habitat or other sensitive natural community. As discussed above, the planning area is completely urbanized and does not contain any natural habitat. In addition, plant life within the planning area is limited to ornamental trees and landscaping. According to the United States National Wetlands Inventory (NWI), no riparian habitat or other sensitive natural community identified by the California Department of Fish and Wildlife or US Fish and Wildlife Service occurs in the planning area.<sup>5</sup> The proposed Housing Element Update does not include approval of any development project and does not include any physical alterations to the planning area. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in any local or regional plans, policies regulations or by the CDFW or by the U.S. Fish and Wildlife Service. No impact would occur.



**c) No Impact.** A significant impact would occur if state or federally protected wetlands would be modified or removed as a result of the proposed Housing Element Update. The planning area is completely urbanized and the Housing Element Update does not proposed any physical alterations to the planning area. The proposed project would not have any effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impact would occur.

**d) No Impact.** The planning area is completely urbanized and does not contain any natural or riparian habitat. In addition, plant life within the planning area is limited to ornamental trees and landscaping. The proposed Housing Element Update does not include approval of any development project and does not include any physical alterations to the planning area. The proposed project would not change the existing environment in a manner that would result in impacts to any sensitive habitat areas or interference with the movement of any native resident or migratory wildlife species. No riparian habitat occurs within the planning area; therefore, the project would not interfere with any fish populations. Furthermore, no native wildlife nurseries occur within the planning area. Native avian species may occupy urban sites; however, the proposed project would not remove or disturb any trees or landscaping. Therefore, the proposed Housing Element Update would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. No impact will occur.

**e) No Impact.** The proposed Housing Element Update does not include approval of any development projects and would not result in the removal or disturbance of any trees. As such, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would occur.

**f) No Impact.** No native habitat exists within the fully urbanized planning area. The planning area is not located in an area that would be subject to any Habitat Conservation Plans or Natural Community Conservation Plan. Therefore, the proposed project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact will occur.

### 4.5 – Cultural Resources

Would the project:

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

**a) No Impact.** A significant impact would occur if the proposed Housing Element Update would cause a substantial adverse change in the significance of a historical resource. According to the General Plan, Commerce contains several known points of local and statewide historical and cultural interest, and three historic sites in Commerce are officially commemorated. The Uniroyal Tire Plant and the Pillsbury Mill are both listed on the State Register of Historical Places, and a plaque marks the site of Vail Landing Field, where Western Airlines began its West Coast passenger and airmail service. Additional sites of interest include the Union Pacific (East Los Angeles) Train Station; the Mount Olive, Russian Molokan Christian Spiritual Jumpers Lemente, and Mount Carmel ethnic cemeteries; and the 1942 Sleepy Lagoon Murder site. The proposed Housing Element Update does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur; thus, programmatic impacts associated with potential development of the Inventory Sites would remain within the scope of analysis certified in the General Plan EIR. Future development under the updated Housing Element would not substantially change the location, distribution, or overall density of development within the City other than for the Inventory Sites. Future development of the Inventory Sites would be subject to project-specific environmental review pursuant CEQA, as applicable, and would be required to comply with General Plan policies that will be effective in maintaining and preserving important cultural resources in the City. Because historic properties are not located on any of the identified Inventory Sites, implementation of the proposed Housing Element Update would not cause substantial adverse change in significance of a historical resource. Therefore, no impact would occur.

**b) No Impact.** A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed Housing Element Update. Prior to European contact, the local Gabrielino Indians lived in more than 50 villages located throughout the Los Angeles Basin. Three early villages were located in the vicinity of Commerce: Apachianga, Isantcangna, and Tsungna. Indian gathering activities were most likely concentrated along the Los Angeles and Rio Hondo River channels. Another post-contact Indian village site, referred to as La Jaboneria (the soap factory), was known to have existed on the east bank of the Rio Hondo River in an area located south of Telegraph Road. The potential for uncovering significant resources at Inventory Site locations during construction activities is unknown given that no such resources have been discovered and/or recorded

previously. The Commerce General Plan requires all construction work to cease if archaeological resources are discovered during excavation and grading activities until appropriate salvage measures are established. In addition, two changes to State law (SB 18 and AB 52) require cities to consult directly with local Native American tribes to determine if any tribal cultural resources would be impacted by private development or public works projects proposed in the City. The General Plan EIR noted that the City is fully developed and has undergone extensive ground disturbance associated with past development and excavations. In addition, the potential for archaeological resources in the City is considered low due to the geological and topographical characteristics of the area. This Initial Study examines the potential environmental impacts at a program level for only the Housing Element Update since the Housing Element Update itself does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. Therefore, long-term impacts in the City have already been contemplated and the proposed Housing Element Update would not result in impacts that are greater than those identified in the General Plan EIR. In addition, future development of the proposed Inventory Sites would be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA as well as goals and policies of the General Plan intended to maintain and preserve important cultural resources in the City. Therefore, there would be no potential for uncovering archaeological resources, and impacts to archaeological resources would not occur as a result of the Housing Element Update.

**c) No Impact.** A significant impact would occur if previously uncovered human remains would be disturbed during development of a project. As previously discussed, according to the General Plan EIR, this region has been occupied by Native American tribes for thousands of years. Future development of the proposed Inventory Sites that require site preparation and earthmoving activities have the unlikely potential to uncover buried or surficial human remains outside of a recognized cemetery or other burial location. However, should human remains be discovered, the contractor is required to comply with State Health and Safety Code §7050.5. This requires halting work in the immediate area of the find and notifying the County Coroner, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of Native American origin, the Coroner is required to contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary. Because the proposed Housing Element Update does not include approval of any development project that would involve ground-disturbing activities, and future development projects would be required to comply with existing regulations related to buried human remains, impacts to buried human remains would not occur.

## 4.6 – Energy

Would the project:

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

**a) Less than Significant Impact.** Future housing developed in accordance with the goals and policies of the proposed Housing Element Update would have the effect of contributing to increased energy consumption in the City which would be part of regional growth in energy use as the surrounding communities continue to grow as well. Future growth in the City would be required to be consistent with the state’s energy conservation regulations as codified in Title 24 of the CCR and the California Green Building Code. In addition, future development must comply with General Plan policies intended to reduce energy consumption. In addition, as older existing development is replaced by newer development, compliance with Title 24 Green Building standards would result in greater energy efficiency. With implementation of existing regulations and policies, the Housing Element Update would not result in wasteful, inefficient, or unnecessary energy use. Therefore, impacts would be less than significant.

**b) Less than Significant Impact.** The analysis in Section 4.6 (a) above demonstrates that the proposed Housing Element Update would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed above, future development under the HEU would be subject to the California Title 24 Building Code energy efficiency standards for residential buildings as well as General Plan policies intended to reduce energy consumption overall within the City. Future development of any individual Inventory Site would be subject to project-specific review pursuant to CEQA. In addition, equipment and vehicles associated with construction and operation of future development under the HEU would also be subject to fuel standards at the state and federal level. Therefore, the project would not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

### 4.7 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**a.i) Less than Significant Impact.** The City of Commerce is located in a seismically active region of Southern California. However, no Alquist-Priolo Earthquake Fault Zones have been identified in the City of Commerce, as identified by the State Department of Conservation.<sup>6</sup> The City of Commerce complies with the Alquist-Priolo Earthquake Fault Zoning Act of 1972 through Commerce Municipal Code (CMC) Chapter 15.07 (Building Code). The CMC requires an engineering geology report be prepared for all projects within Alquist-Priolo zones, as well as other areas when deemed necessary by the City Engineer. Before projects can be permitted, the geologic investigation must demonstrate that proposed buildings will not be constructed across active faults. Structures for human occupancy must be set back at least 50 feet from active faults. The evaluation and written report must be prepared by a registered geologist. None of the Inventory Sites are located within an Alquist-Priolo fault zone. All future development under the proposed Housing Element Update would be subject to all applicable federal, state, and local building code regulations, including the California Building Code (CBC) seismic standards as approved by the Commerce Building Safety Division and City approved construction permit. The proposed Housing Element Update would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, impacts would be less than significant.

**a.ii) Less Than Significant Impact.** A significant impact could occur if the proposed Housing Element Update would cause personal injury or death or result in property damage as a result of seismic ground shaking. As discussed above, the City is located in a region subject to violent ground shaking and heavy damage to property in potential earthquake scenarios. Compliance with existing local City building standards and other applicable seismic related design requirements is intended to reduce the potential for damage to occur as the result of rupture of known earthquake faults in the region. All construction in Commerce is required to occur in compliance with the most current CBC requirements. All future development under the proposed Housing Element Update would be required to be completed in compliance with federal, state, and local building code regulations, including CBC seismic standards as approved by the Commerce Building Safety Division and City approved construction permit. While the potential for strong seismic activity is present throughout Southern California, the proposed Housing Element Update would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, impacts would be less than significant.

**a.iii) No Impact.** Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition due to the effects of increased pore-water pressure. This typically occurs where susceptible soils (particularly soils in the medium sand to silt range) are located over a high groundwater table. A high groundwater table is described as one within 50 feet of the surface. According to the General Plan EIR, the City is considered to have a limited liquefaction hazard. According to more recent studies completed by the State of California Division of Mines and Geology’s (CDMG) Seismic Hazard Zones Mapping Program, the portion of the City that may exhibit liquefaction hazards is located in the vicinity of the Bandini-Rosini neighborhood. No unstable earth conditions or changes in geologic substructures are anticipated to occur with the excavation, grading, and paving that would be needed for any future development. The potential ground motion effects (lateral movement, fault creep, ground-shaking) in the City are no greater than those expected for the surrounding region. Future development would not introduce any new impacts, and, as a result, the impacts associated with seismic ground motion are considered to be less than significant. Therefore, the proposed Housing Element Update would not result in direct or indirect seismic-related ground

failure including liquefaction, and would not expose people or structures to potential ground failure due to liquefaction.

**a.iv) No Impact.** Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The City of Commerce and surrounding area is in a flat, urbanized setting devoid of steep slopes. The City is not mapped as an area of potential earthquake-induced landslide movement on the State of California Seismic Hazards Zones Map. Therefore, the Housing Element Update would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur.

**b) Less than Significant Impact.** Natural forces, both chemical and physical, are continually at work breaking down and moving rocks, minerals, and soils. Erosion poses environmental hazards through the effect of removing soils that can undermine roads and buildings and destabilize slopes. Erosion can also result in environmental damage by depositing soils in downstream reservoirs, lakes, and drainage structures that can result in impacts to wildlife and human health by changing the ecological properties or the physical boundaries of the water body or drainage control device. The proposed Housing Element Update does not include any physical alterations to the project area and would not involve any ground-disturbing activities. Future developments on proposed Inventory Sites are subject to federal and state regulations limiting erosion pursuant to NPDES requirements, and SCAQMD rules. Therefore, impacts due to erosion of topsoil would be less than significant with adherence to existing regulations.

**c) No Impact.** Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. Liquefaction occurs when seismic waves pass through saturated granular soil, distorting its granular structure, and causing some of the empty spaces between granules to collapse. Due to the urbanized character of the project area, the potential for lateral spread occurring on or off the Inventory Sites is considered negligible. As described above, the project area is not subject to liquefaction hazards. Because the project area is completely developed with structures, landscaping, asphalt parking, and roadway features, it can be assumed the project area is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of future development, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, no impact would occur.

**d) No Impact.** The project is not characterized by expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1997). Moreover, because the project area is currently developed, subsurface soils would have been excavated, and compacted in accordance with standard building code practices, including removal of any expansive or other non-engineered soils, no impacts related to expansive soils would occur as a result of future development under the proposed Housing Element Update. Therefore, no impact would occur.

**e) No Impact.** The City of Commerce is served by a municipal sewer system and future development would not require installation of septic tanks. Therefore, no impact would occur.

**f) Less than Significant Impact.** The General Plan EIR noted that the City is fully developed and has undergone extensive ground disturbance associated with past development and excavations. In addition, the potential for paleontological resources in the City is considered low due to the geological and topographical characteristics of the area. Finally, no paleontological resources have been uncovered in the area. The proposed Housing Element Update does not include any ground disturbing activities. The proposed project would not directly or indirectly result in the destruction of a unique paleontological resource or unique geologic feature. Therefore, impacts would be less than significant.

## 4.8 – Greenhouse Gas Emissions

Would the project:

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

**a) Less than Significant Impact.** Climate change is the distinct change in measures of climate for a long time period. Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth’s orbit around the Sun or direct changes within the climate system itself (i.e., changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet’s surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes, raising livestock, and deforestation activities; and some agricultural practices.<sup>7</sup>

Greenhouse gases differ from other emissions in that they contribute to the “greenhouse effect.” The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the Earth’s surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth’s temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

The General Plan EIR did not evaluate GHG impacts as that environmental issue was not considered in CEQA documents at that time; however, the General Plan EIR concluded overall development would



have a less than significant air quality impact with implementation of General Plan policies and programs. This Initial Study examines the potential environmental impacts at a program level for only the Housing Element which, by its self does not specifically authorize the construction of any housing development. Subsequent to this Housing Element Update, the City will be undertaking General Plan and zoning designation amendments that will increase land use capacity necessary to accommodate the RHNA. This effort will be subject to a separate CEQA analysis. Also, any future site-specific development proposal subject to CEQA review would be required to analyze potential GHG emissions and, if necessary, implement project-specific mitigation measures to reduce emissions to below SCAQMD significance thresholds. Therefore, impacts would be less than significant at this program level and no programmatic mitigation is needed.

**b) Less than Significant Impact.** Future housing would be constructed on undeveloped and currently developed, underutilized properties. GHG emissions would be evaluated during the City's standard environmental review process as required by CEQA, and using the Best Performance Standards (BPS) method promulgated by the SCAQMD. Future projects would be required to comply with existing regulations requiring energy efficiency in building design and construction, ensuring GHG emissions would not be considered cumulatively considerable in the context of global climate change and resulting impacts. Some projects may be required to identify a GHG emissions inventory using regulatory and industry standard methodologies and measures. Incorporation of appropriate BPS would ensure compliance with the regional CAP and by extension the targets identified in the state Scoping Plan for reduction of GHG emissions. Future development would also be required to implement project-specific mitigation to reduce estimated GHG emissions. Therefore, impacts would be less than significant at this program level and no programmatic mitigation is needed.

### 4.9 – Hazards and Hazardous Materials

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Less Than Significant Impact.** During construction of future housing, there would be a minor level of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include, but is not limited to, fuels and lubricants for construction machinery, coating materials, and other building materials. Federal, state, and local regulations associated with construction sites and use of associated hazardous materials include routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up. These uniformly applicable standards would be sufficient to reduce potential impacts from future housing development to a less than significant level.

Residential development does not cause or contribute substantially to potential hazards to the public or the environment because residential uses do not involve the use, transport, or disposal of appreciable amounts of hazardous materials or wastes. Residential uses also do not generate toxic waste. Residential uses are characterized by the use of common, widely available hazardous materials including paints and other solvents, cleaners, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Consumer-level household hazardous materials and wastes are not subject to federal or state permitting by the consumer, and their use is at such levels as to not have the potential to result in risk of upset or accident that could harm a substantial number of people, including children attending schools in the area, or have a substantial effect on the functions of the local or regional ecosystem. Therefore, the proposed Housing Element would have a less than significant impact with regard to the routine transport, use, and disposal of hazardous materials.

**b) Less Than Significant Impact.** As stated in section 4.9.a, federal, State, and local regulations associated with construction sites and use of associated hazardous materials include routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up. In addition, future housing would not emit hazardous emissions or handle hazardous materials as residential land uses do not result in such impacts. Therefore, the proposed Housing Element would not create a significant hazard to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

**c) Less Than Significant Impact.** Multiple schools are located within the plan area. As stated in section 4.9.a above, construction activities resulting from future housing development could involve the transport, use, and disposal of hazardous waste materials. However, construction activities are subject to uniformly applicable standards set forth by federal, state, and local agencies. Operational activities resulting from future residential uses would not emit any hazardous emissions or result in the handling of hazardous or acutely hazardous materials, substances, or waste. Therefore, potential impacts from emitting hazardous emissions, handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of existing or proposed schools would be less than significant.

**d) Less Than Significant Impact.** According to the EnviroStor website of the California Department of Toxic Substances Control, facilities listed within Commerce are spread throughout the City as a result of its long history with industrial uses.<sup>8</sup> However, none of Inventory Sites are listed as hazardous waste or substances sites, leaking underground storage tank sites, solid waste disposal sites, hazardous waste facilities subject to corrective action, Cleanup Program Sites, or sites regulated by the Regional Water Quality Board.<sup>9</sup> In addition, the General Plan requires that residential projects and other sensitive receptors be located an adequate distance from existing and potential sources of toxic emissions. Future housing development on proposed Inventory Sites would be required to assess potential impacts from hazardous materials sites as part of standard environmental review procedures pursuant to CEQA

and City policy. Therefore, the proposed Housing Element would not create a significant hazard to the public or the environment.

**e) No Impact.** Development within the vicinity of an airport can result in increased potential for impact due to height, glare, and electronic interference that can disrupt flight patterns and pilots operating out of the airport. The City of Commerce is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport to the plan area is the San Gabriel Valley Airport, which is approximately 9.25 miles to the northeast of the City. Therefore, no impact would occur.

**f) No Impact.** The City's Emergency Preparedness Division coordinates disaster response and recovery efforts in the City of Commerce, and includes the City's 20-member Urban Search and Rescue (USAR) team, which is on-call group of dedicated employees who are trained to respond to disasters within the City such as power outages, severe rain storms, and other emergencies. The City's state-of-the-art Emergency Operations Center (EOC) facility serves as the headquarters for first responders in an emergency, such as an earthquake or other major disaster. In addition to being resistant to fire and seismic activity, it features a fully integrated audio/visual and communications system. This allows staff to track progress on incidents and EOC functions like planning, finance, logistics, operations and public information. The facility is also equipped with an auxiliary power source, a back-up generator, additional space to execute EOC operations, and other emergency equipment and supplies. Commerce's first responders have a fully functional facility from which to conduct emergency response operations. The City also operates a mobile EOC outfitted with the necessary communications equipment to assist rescue workers in case of a disaster. The City is also part of a County and statewide emergency management system that addresses evacuation and movement of people in the event of an emergency. The proposed Housing Element Update does not include any physical alterations to the planning area or include any land use, circulation, or safety changes that could conflict with the operations of the Emergency Preparedness Division or the EOC. In addition, no changes to the existing transportation circulation system or an existing emergency response plan or evacuation plan would occur as a result of the proposed Housing Element Update. Therefore, no impact would occur.

**g) No Impact.** As noted by CALFIRE Fire Hazard Severity Zone Maps, the planning area is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.<sup>10</sup> Furthermore, the City of Commerce is completely urbanized and lacks any wildland features. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

### 4.10 – Hydrology and Water Quality

Would the project:

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

**a) Less than Significant Impact.** The City of Commerce has prepared a Stormwater Management Implementation Plan to support the City’s application for a Municipal Storm Water (MS4) Permit to the

Los Angeles Regional Water Quality Control Board. The Housing Element Update represents the five-year management strategy for controlling the discharge of pollutants to the maximum extent practicable in storm water runoff during the first NPDES storm water permit term. Commerce's Municipal Code implements the City's storm water quality management strategies consistent with its General Construction permit from the Regional Water Quality Control Board. These regulations are applicable to all storm water generated on any developed or undeveloped land within the City.

Housing is a common type of urban development and is addressed in the City waste discharge requirements for construction and operational sources of pollutants that can affect downstream surface water bodies by discharge into the local storm drain system. Discharge of pollutants into water bodies can result in effects on the beneficial uses of the water body. Beneficial uses include water for agricultural uses, special areas for biological resources, cold freshwater habitat, commercial and sport fishing, multitudes of habitats, freshwater replenishment sources, areas of artificial or natural groundwater recharge, water for industrial supply and process, water for domestic uses, waters used for navigation, areas where rare or endangered species could occur, fish spawning grounds, migration, shellfish harvesting, and recreational activities.<sup>11</sup> The resulting impacts due to effects on water quality and associated beneficial uses include disruption of the ecosystem due to the loss of habitat, potential harm or death to sensitive species, and a narrowing of migratory options and species' gene pools. Impacts to humans range from quality of life issues such as the loss of recreational waters to potential health impacts due to contamination of drinking water supplies and contamination of fish and other marine life farmed and sold for food.

The proposed Housing Element Update does not include any policies or programs that would conflict with implementation of the NPDES program such that future residential development could result in exceedance of the waste discharge requirements and thus would not substantially impact downstream water quality. Furthermore, future housing development would be subject to environmental inquiry and potential review pursuant to CEQA. Impacts related to violation of water quality standards and waste discharge requirements would be less than significant with implementation of existing regulations.

**b) Less than Significant Impact.** Future housing would require potable water for drinking, food preparation, cleaning, and bathing as well as water for landscape irrigation and would generate demand for water in addition to the demand of existing uses and the incremental increase in demand as growth occurs in the area. Therefore, the future housing would contribute to cumulative, long-term increases in demand for groundwater and other water resources. The City is situated between the Los Angeles and Rio Hondo Rivers both of which are fully improved flood control channels. Water is essential to the proper function of an ecosystem and human life and activities; thus, water shortages can impact the health and well-being of humans and the quality of the environment.

According to State law, local water agencies must regularly update their Urban Water Master Plan and large development projects must prepare a separate water supply assessment (WSA) to identify how to avoid or reduce impacts on surface or groundwater supplies over a 20-year period even under drought conditions. Subsequent to adoption of the Housing Element, the City will amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The proposed Housing Element Update does not involve development of any of the Inventory Sites; and does not designate any additional Inventory Sites than were evaluated in the General Plan EIR. Therefore, potential programmatic impacts associated with the Inventory Sites would remain within the scope of analysis in the General Plan EIR. Future development of the Inventory Sites would be subject to environmental inquiry and possible project-specific environmental review pursuant to CEQA. Considering the proposed Housing Element is consistent with the analysis documented in the General Plan EIR and would not increase surface or groundwater

demand beyond that assessed in the General Plan EIR, the HEU would result in equivalent or less than significant impacts related to the decline in groundwater levels when compared to the analysis and conclusions in the General Plan EIR.

**c) Less than Significant Impact.** The City of Commerce is situated between the Los Angeles and Rio Hondo Rivers both of which are fully improved flood control channels. Future development of housing would occur on currently or previously developed sites and undeveloped sites but would not alter existing drainage channels or patterns. Development on currently or previously developed sites is unlikely to substantially change the hydrological conditions of planning area. Development on previously undeveloped sites may result in more substantial changes to the site topography and drainage conditions as cut and fill activity occurs to balance the site for building construction: potential site-specific impacts would be evaluated and addressed at the time that such development is proposed.

According to the General Plan EIR, implementation of the General Plan would reduce potential impacts related to additional runoff such as erosion and flooding to less than significant levels and requires the maintenance of adequate facilities for water and storm drain services. Therefore, impacts due to the effects of changes in drainage patterns or potential erosion relative to the proposed Housing Element Update would be less than significant with implementation of existing regulations and General Plan goals and policies.

**d) Less than Significant Impact.** Most of Commerce faces minimal flood hazards, as outlined by the Federal Emergency Management Agency (FEMA) hazard maps. The City is adjacent to the Rio Hondo and Los Angeles Rivers which are susceptible to 100-year flooding events; however, they are contained within the improved banks of their respective channels. The FEMA maps also show the entire City is at risk of flooding from a 500-year flood event.<sup>12</sup> However, none of the proposed Housing Element Inventory Sites are located within a 100-year flood hazard area.

Inundation from the Hoover Reservoir and Whittier Narrows Dam located approximately 4 miles northeast of Commerce poses the greatest threat from dam inundation for the City. The dam was built as a flood risk management and water conservation project in 1957 and creates a reservoir capacity of 9.75 million gallons of water. In 2016, the U.S. Army Corps of Engineers determined the dam is structurally unsafe and poses a potentially catastrophic risk to the communities along the San Gabriel River floodplain. In addition, engineers found that the mile-long earthen structure could fail if water were to flow over its crest or if seepage eroded the sandy soil underneath. Measures to permanently address these issues are currently being developed and evaluated (as of 2020). The U. S. Army Corps of Engineers (USACE) has determined that inundation from dam failure would affect all the commercial, industrial, and residential areas of the City.<sup>13</sup>

For future housing under the HEU, the General Plan requires each project to demonstrate it is not impacted by a 100-year flood zone or what steps it would take to eliminate that risk. CEQA also requires projects identify specific criteria and conditions that must be met to avoid potential impacts from flood hazards, such as application of flood hazard regulations, evaluation of development sites for flood hazard potential, and application of flood-proofing strategies. Therefore, impacts would be less than significant with implementation of existing regulations.

*Seiche* is the process by which water sloshes outside its containing boundaries, generally due to an earthquake. *Seiche* can result in localized flooding that can result in property damage or personal injury. This could occur within an open reservoir, lake, or other large waterbody (see discussion regarding the Hoover Reservoir). The City does not contain any sizeable open reservoirs, lakes, or other large bodies of water, therefore, impacts resulting from the effects of *seiche* in the City would be less than significant and no mitigation is required. A *tsunami* is a large wave that generates in the ocean, generally from an

earthquake, and builds intense strength and height before impacting a coast. Tsunami can result in significant property damage and loss of life due to the intense, destructive nature of the wave and the often-sudden occurrence with little chance for warning. The City would likely experience minimal impacts from the effects of a tsunami because it is located approximately 12 miles inland of the Pacific Ocean. In addition, according to the General Plan EIR, the City is relatively flat and risk of hazard due to mudflow is less than significant.

For the reasons above, the potential impacts of flooding, tsunami, or seiche and any related release of pollutants would be less than significant.

**e) Less than Significant Impact.** This assessment is for both surface water management planning and sustainable groundwater management plans.

**Water Quality Control Plan.** The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) is the water quality control plan for the greater Los Angeles Basin, including the City of Commerce.<sup>14</sup> The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan.<sup>15</sup> The Basin Plan is continually being updated to include amendments related to implementation of the total maximum daily load (TMDL) of specific potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB region, and changes to beneficial use designations and associated water quality objectives.<sup>1</sup> The General Plan requires future development to be consistent with the Basin Plan. Therefore, the proposed Housing Element Update would not conflict with or obstruct implementation of a water quality control plan.

**Groundwater Management Plan.** In 2014, Governor Brown signed the Sustainable Groundwater Management Act (SGMA) into law which requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.

The Commerce Public Works Department provides domestic water service to City residents and businesses. The City overlies the Central (groundwater) Basin which was adjudicated in 1965 and the Central Basin Watermaster manages groundwater supplies and replenishment. The City Public Works Department coordinates with the Watermaster to assure adequate water service to the City. The master groundwater planning of the Watermaster is based on adopted land use plans in the General Plans of the cities that utilize Central Basin groundwater. Subsequent to this Housing Element Update, the City would be undertaking focused General Plan and zoning ordinance amendments to ensure sufficient land use capacity is available to accommodate the RHNA. This Initial Study examines the potential environmental impacts at a program level for only the Housing Element Update since the Housing Element itself does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects would occur. Therefore, the proposed project would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

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<sup>1</sup> TMDL is a regulatory term in the U.S. Clean Water Act, describing a plan for restoring impaired waters that identifies the maximum amount of a pollutant that a body of water can receive while still meeting water quality standards.



### 4.11 – Land Use and Planning

Would the project:

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

**a) No Impact.** Communities form neighborhoods within a broader assemblage of land uses, acting as physically bounded social networks that often define a person’s local sense of place and help shape an individual’s social and cultural perspective, particularly as a youth. A significant impact would occur if proposed Inventory Sites are sufficiently large or configured in such a way so as to create a physical barrier within an established community.

Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The proposed Housing Element Update identifies Inventory Sites throughout the City; however, the project does not propose specific development on any specific Inventory Site at this time. Therefore, implementation of the proposed Housing Element would not create any physical barrier within the community. Furthermore, project implementation would not require new infrastructure systems such as roadways or flood control channels not already planned and previously considered in the General Plan EIR. As such, the Housing Element Update would not divide or disrupt neighborhoods or any other established community elements. No impact would occur.

**b) No Impact.** The Housing Element Update sets forth policies to encourage housing development consistent with adopted land use policies established in the General Plan. The proposed project does not include construction on any of the Inventory Sites at this time, and the subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The proposed Housing Element does not include any goals, policies, or programs that would conflict with adopted General Plan goals and policies to mitigate impacts due to effects generated by development within the Planning Area, as specified in the certified General Plan EIR. Therefore, no impact would occur.

### 4.12 – Mineral Resources

Would the project:

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

**a-b) Less Than Significant Impact.** Minerals refer to aggregate resources, or rock, sand, and gravel, energy-producing fields, including oil, gas, and geothermal substances, and related mining operations. The California Department of Conservation (DOC) classifies land in the state into mineral resource zones based on the known or inferred mineral resource potential of that land.<sup>16</sup> The City is located in the San Gabriel Valley Production-Consumption (P-C) Region of the greater Los Angeles metropolitan area.<sup>17</sup> Land in the City has been classified by the California Division of Mines and Geology (CDMG) according to the presence or absence of significant sand and gravel deposits (suitable for use in construction-grade aggregate). The land classification is presented in the form of maps showing Mineral Resource Zones (MRZ). There are four MRZ classifications, MRZ-1 through MRZ-4 as described below:

- MRZ-1 are areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2 are areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- MRZ-3 are areas containing mineral deposits the significance of which cannot be evaluated from available data.
- MRZ-4 are areas where availability information is inadequate for assignment to any other MRZ-zone.

The General Plan EIR states that the City has not designated locally important mineral resource recovery areas within or immediately adjacent to the City. The Commerce General Plan EIR concluded that there would be no impact to the availability of mineral resources of value to the State or City.

**Oil Wells.** According to the General Plan EIR, the City of Commerce overlies a portion of the Bandini and East Los Angeles oilfields. Eighteen wells currently pump resources from the Bandini oilfield, and two of these wells lie within the City limits. In 1995, the field produced 45,600 barrels of oil, averaging 8.9 barrels per day. The East Los Angeles oilfield is currently tapped by twelve wells, none of which are located in Commerce. The East Los Angeles oilfield produced 34,400 barrels in 1995. The amount of oil drawn from these fields is insignificant when compared to the nearly 30.7 million gallons of oil Californians consume every day. In addition to these active wells, there are approximately 106 closed and/or capped and abandoned wells within the City.

Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The Housing Element Update does not propose specific development on any specific Inventory Site at this time; therefore, programmatic impacts of the Housing Element are similar to those already analyzed in the General Plan EIR. In addition, none of the Inventory Sites contains active oil or gas wells. Finally, any new development under the proposed project would require an assessment of hazards such as onsite oil or gas wells as part of the CEQA process. Therefore, impacts would be less than significant.

### 4.13 – Noise

Would the project result in:

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

Noise can be defined as unwanted sound that consists of energy waves that people receive and interpret. Sound pressure levels are described in logarithmic units or ratios of sound pressures to a reference pressure, squared. These units are called *be/s*. To account for the range of sound that human hearing perceives, a modified scale is utilized known as the A-weighted decibel (dBA). Since the decibels are logarithmic units, sound pressure levels cannot be added or subtracted by ordinary arithmetic means. Typically doubling the traffic volume on a street or the speed of the traffic will increase the traffic noise level by 3-dBA. A 3-dBA change in sound is the beginning at which humans generally notice a barely perceptible change in sound, and a 5-dBA change is generally readily perceptible.<sup>18</sup>

**a) Less Than Significant Impact.** The City of Commerce includes several major arterial roadways, including Washington Boulevard, Garfield Avenue, Slauson Avenue, Telegraph Road, Eastern Avenue, and Atlantic Boulevard. Two major freeways also traverse the City: Interstate 5 (I-5) and Interstate 710 (I-710). The main existing noise sources within Commerce include vehicular traffic on these freeways and on the major arterials that traverse the City. In addition, both the BNSF and Union Pacific railroads operate in the Commerce area. Rail freight operates within long-established rail easements/rights-of-way that traverse the City, largely with at-grade street crossings. Crossings are located primarily at arterial roadways. These at-grade crossings can be a source of congestion, restricting car and truck movement when long freight trains rumble through the City.

To ensure that noise producers do not adversely affect sensitive receptors, the City of Commerce identifies land use compatibility standards within the General Plan to use for planning and development

decisions. The General Plan Noise Element includes policies, standards, criteria, programs, diagrams, and maps related to protecting public health and welfare from excessive noise exposure. General Plan Goals and Policies together with Municipal Code standards for noise control are incorporated into the land use planning process to reduce noise and land use incompatibilities.

According to the General Plan EIR, construction activity is typically short-term in nature and is generally not considered to have a significant impact on noise sensitive uses as long as construction activity is limited to daylight hours. Additionally, acoustical analyses for future housing development projects under the proposed Housing Element Update would address construction noise impacts on sensitive noise receptors and identify mitigation if required.

Operation of future housing developments on the proposed Inventory Sites are subject to the policies of the existing General Plan that are designed to minimize noise impacts to noise-sensitive properties. The General Plan requires noise studies as part of the standard environmental review process for housing developments. These studies would evaluate noise levels and incorporate design features or mitigation measures necessary to minimize adverse noise impacts.

Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The Housing Element Update does not propose specific development on any specific Inventory Site at this time; therefore, programmatic impacts associated with potential development of the Inventory Sites would remain within the scope of analysis in the General Plan EIR. Future Housing Development would be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed, should noise impacts be identified. Therefore, potential impacts from the proposed project would be less than significant with implementation of existing standards and regulations.

**b Less Than Significant Impact.** Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second, and in the U.S. is referenced as vibration decibels (VdB). The background vibration velocity level in residential and educational areas is usually around 50 VdB while the vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors cause most perceptible indoor vibration. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is the general threshold where minor damage can occur in fragile or historic buildings.

As mentioned in the General Plan EIR, it is unknown if rail operations through the City could increase in the future, therefore, noise levels generated by trains would remain the same as under existing conditions where land uses within 125 feet of the train tracks may experience noise levels in excess of 60 dB. Because the proposed Housing Element Update identifies some Inventory Sites in close proximity to the rail corridor, potential future development and redevelopment to occur within the area may be exposed to noise levels in excess of 60 dB. With regard to railroad operations, noise and vibration impacts would be evaluated on a project-by-project basis pursuant to CEQA and the City's local implementation procedures, and project specific mitigation measures required if necessary.

Typical construction vibration mitigation includes routing and placement of equipment to maximize distance to receptors and use of alternative equipment, such as use of drilled pile drivers as opposed to impact drivers. Subsurface dampeners can also be utilized to reduce groundborne vibration. Short-term Impacts related to groundborne vibration during construction would be expected to be less than significant with implementation of local environmental review procedures. Typical mitigation for long-term vibration impacts related to occupied buildings include setbacks from vibration sources or building construction to minimize transmission of vibration.

No short- or long-term impacts would be associated with vibration at a programmatic level for this Housing Element Update as no land use policy changes, developments, or infrastructure improvements are proposed as part of the Housing Element Update. Therefore, impacts would be less than significant.

**Cumulative Impacts.** Residential land uses typically do not produce excessive noise either individually or cumulatively that could substantially increase existing, ambient noise levels. Future development of the identified Inventory Sites could increase ambient noise levels due to increased traffic generation in the project vicinity. Thus, development of the Inventory Sites would partially contribute to the noise volumes identified in the General Plan EIR. The City requires review of all new development proposals per CEQA, which includes the analysis of vehicular traffic noise. As discussed above, the Housing Element Update does not propose any specific development at this time that would invalidate this prior finding or further increase traffic levels beyond those analyzed in the General Plan EIR. Project-specific increases in ambient noise levels due to future development on identified Inventory Site would be evaluated as development is proposed over the long term pursuant to existing policies and procedures. With these existing policies and procedures in place, potential impacts of this project related to increases in ambient noise levels would be less than significant.

**c) No Impact.** The City of Commerce is not located within two miles of an airport or within a comprehensive land use plan for any public or private airport. In addition, no private airstrips are located within the City. No specific new development is associated with the proposed Housing Element Update, and no changes to safety policies related to air traffic are proposed. Therefore, no impacts would occur.

### 4.14 – Population and Housing

Would the project:

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

**a) Less than Significant Impact.** Adoption and implementation of the proposed Housing Element Update would not, in and of itself, directly result in population growth. Population growth is a complex interaction of immigration, emigration, births, deaths, land use, and economic factors of which the General Plan and Housing Element are only a part. Regional models of population growth and change, accounting for these complexities, are developed by the California Department of Housing and Community Development (HCD) and Southern California Association of Governments (SCAG). The proposed Housing Element Update is designed to guide and accommodate the City’s share of the projected regional population growth and associated housing over the next eight years. Pursuant to Government Code 65584, the California Department of Housing and Community Development (HCD) is required to determine the Regional Housing Needs Allocation (RHNA), by income category, for Council of Governments (COGs) throughout the state. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category.

The proposed Housing Element is a policy document setting forth the City’s plan to accommodate its share of regional housing needs, as determined by the Southern California Association of Governments (SCAG). For the 2021-2029 planning period, the City of Commerce’s share is 247 housing units.<sup>19</sup> The Housing Element identifies adequate land and planning mechanisms to accommodate the future housing needs of the growing population derived directly from the population growth estimates for the region, so the proposed Housing Element Update would not induce unplanned population growth. Therefore, impacts would be less than significant.

**b) No Impact.** The proposed Housing Element Update is intended encourage and facilitate housing development and preserve and enhance existing housing stock. The natural recycling of land would not result in the loss of housing units because such redevelopment would result in the development of new housing units. Thus, the availability of residential units in response to increases in population is

#### *4 – Evaluation of Environmental Impacts*

supported by the Housing Element. Considering residential units would increase naturally as guided by the goals and policies of the proposed Housing Element, no impacts related to the displacement of housing or people would occur as a result of the proposed project.



### 4.16 – Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Less Than Significant Impact.** The Los Angeles County Fire Department (LACFD) provides fire protection within Commerce at the following three stations: Station 22 located at 928 South Gerhart Avenue, Station 27 located at 6031 Rickenbacker Road, and Station 50 located at 2327 Saybrook Avenue. Future housing development could impact fire protection services by placing an additional demand on existing Los Angeles County Fire Department resources should its resources not be augmented. To offset the increased demand for fire protection services, future housing development would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes. Furthermore, future housing projects would be required to comply with the provisions of the City’s Development Impact Fee Ordinance, which requires a fee payment to assist the City in providing for fire protection facilities. Payment of these fees would ensure that future development under the proposed Housing Element provides fair share funds for the provision of additional fire protection facilities. Therefore, the proposed Housing Element would not result in the need for new or physically altered fire facilities in order to maintain acceptable service ratios, response times or other performance objectives. Impacts would be less than significant.

**b) Less Than Significant Impact.** The Los Angeles County Sheriff’s Department (LACSD) provides law enforcement services to the City of Commerce. The nearest LASD station is located approximately a mile north of the City at 5019 East 3rd Street within unincorporated Los Angeles County. According to the General Plan EIR, the Sheriff’s Department anticipates that as the City grows additional police facilities to house additional equipment and officers may need to be constructed. The locations of future facilities are not known at this time. An expanded existing station or new future stations may be required in order to maintain an acceptable level of service. The effects of constructing and operating a new police station are typical of any development project, such as pollutant emissions from use of construction equipment and staff vehicle trips, changes in the visual character of the station site in the context of the neighborhood, and increased vehicle trips on local roadways. The City collects

Development Impact Fees to offset the impact of new development, as it occurs. Construction and operation of a new Sheriff's station would be subject to preliminary environmental review pursuant to CEQA at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed. Therefore, potential impacts resulting from the effects of constructing and operating future police facilities would be less than significant with implementation of existing regulations.

**c) Less Than Significant Impact.** The City of Commerce is served by the Downey Unified, Los Angeles Unified, El Rancho Unified, and Montebello Unified School Districts. The effects of schools that can result in environmental impacts are specific and include peak traffic levels occurring in the morning and early afternoon, playground noise, and field lighting. Furthermore, analyses of school impacts are unique in that any impacts resulting from the effects of schools are considered fully mitigated through the payment of development impact fees pursuant to the Leroy F. Green School Facilities Act. Therefore, pursuant to State law and the payment of development impact fees, impacts would be less than significant.

**d) Less Than Significant Impact.** Demand for park and recreational facilities are generally the direct result of residential development. The proposed Housing Element would result in the potential for more households with children and adults who want to use parks and recreation facilities. Future housing developed under the proposed Housing Element, therefore, would have the potential to increase use of local park facilities. However, all new development would be subject to payment of development impact fees to cover its fair share of the cost for facility expansion and maintenance. The City would continue to collect in-lieu fees or require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand, thus providing adequate, per-capita facilities for future residents. Finally, construction and operation of new or expanded parks and recreation facilities would be subject to environmental review pursuant to CEQA at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed. Therefore, potential impacts resulting from the effects of constructing and operating future parks and recreation facilities would be less than significant with payment of fees and implementation of existing regulations.

**e) Less Than Significant Impact.** New or relocated residents generated by the provision of new housing guided by the goals and policies of the proposed Housing Element Update would generate the incremental need for a variety of public and quasi-public services including libraries, medical clinics, urgent care facilities, hospitals, social service centers, and other facilities. Construction and operation of new or expanded e facilities would be subject to environmental review pursuant to CEQA at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed. Therefore, potential project impacts resulting from the effects of constructing and operating such facilities would be less than significant with implementation of existing regulations.

**4.18 – Recreation**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a-b) Less Than Significant Impact.** Demand for park and recreational facilities are generally the direct result of residential development. The proposed Housing Element would result in the potential for more households with children and adults who want to use parks and recreation facilities. Future housing developed under the proposed Housing Element, therefore, would have the potential to increase use of local park facilities. However, all new development would be subject to payment of development impact fees to cover its fair share of the cost for facility expansion and maintenance. The City would continue to collect in-lieu fees or require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand, thus providing adequate, per-capita facilities for future residents. Finally, construction and operation of new or expanded parks and recreation facilities would be subject to environmental review pursuant to CEQA at which time all environmental issues would be vetted and appropriate mitigation incorporated, if needed. Therefore, potential impacts resulting from the effects of constructing and operating future parks and recreation facilities would be less than significant with payment of fees and implementation of existing regulations.

### 4.20 – Transportation

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Less than Significant Impact.** The City of Commerce is served by local transportation facilities including roadways and freeways, passenger and freight railways, and bus routes in addition to non-motorized transportation facilities such as sidewalks, trails, and bikeways. These facilities provide options for travel modes that include passenger vehicles, trains, buses, bikes, and walking. These facilities and modes of travel comprise the circulation system for the City. The concern regarding transportation facilities and their counterpart modes of travel is excessive use throughout the day or during morning and/or afternoon peak hours and the resulting effects on the performance of the facilities' ability to move people and goods. The direct effects of reduced circulation system performance are annoyance and stress, thereby decreasing the quality of life for the user. Direct failure or accelerated deterioration of circulation system facilities can also occur if the facility was not designed to function under increased loading. A variety of indirect impacts to human health and the environment are attributed specifically to excessive use of vehicles on local and regional roadways including effects related to air pollution and ambient noise.

**SCAG Plans.** Two planning efforts guide the long-term improvement of the circulation system at the regional and local levels. The Regional Transportation Plan (RTP) and Sustainable Communities Strategy (RTP/SCS) is administered by the Southern California Association of Governments (SCAG) to meet the needs of travel and goods movement through the year 2040. While the RTP/SCS addresses the broader goals of the transportation network, the City's General Plan Circulation Element identifies long-term transportation improvements for local facilities. The General Plan includes goals and policies aimed to provide an efficient multi-modal circulation system in the City. General Plan policies also encourage the development of an efficient and safe bikeway and public transportation system. These local and regional planning efforts are designed to reduce the direct and indirect effects of travel so as to minimize or avoid resulting impacts on human health and the environment. The proposed Housing Element Update is consistent with the growth assumptions used in the development of the RTP/SCS and does not include any land use changes to the General Plan growth projections. Therefore, the

Housing Element Update would not conflict with the goals of transportation planning efforts of the City or SCAG. Furthermore, according to the General Plan EIR, implementation of General Plan policies will avoid or reduce impacts of General Plan build out on the performance of the roadway system.

The proposed Housing Element Update would result in the future development of additional housing in the City although the anticipated growth would be within the limits identified in the existing General Plan and its EIR. Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation and increased housing capacity that would result. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. Future housing under the proposed Housing Element Update would eventually generate increased use of the circulation system. However, the proposed Housing Element Update does not propose specific development on any specific Inventory Site at this time. Future housing development would be subject to preliminary environmental review pursuant to CEQA and, if found not to be exempt, subject to full environmental analysis. At that time, should potentially significant transportation impacts be identified, all environmental issues would be vetted and appropriate mitigation incorporated, as needed. Future housing would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, potential impacts resulting from conflicts with local and regional transportation plans and performance requirements would be less than significant with implementation of existing standards and regulations.

**b) Less Than Significant Impact.** In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA (Section 15064.3). Effective July 1, 2020, the previous CEQA metric of level of service (LOS), typically measured in terms of automobile delay, roadway capacity and congestion, will no longer constitute a significant environmental impact. Although VMT is now the accepted methodology for evaluating potential transportation impacts of a project, the Commerce General Plan identifies standards for maintaining an adequate level of service (LOS) for City streets and intersections. To be consistent with the 2020 State CEQA Guidelines, an LOS analysis is no longer required for purposes of this Initial Study impact analysis and determination of significant impacts under CEQA. In addition, the proposed Housing Element does not include any development projects that could increase VMT in the region. Future housing projects would be subject to environmental analysis under CEQA, and would be required to perform project-specific VMT screening analyses and, if necessary, implement measures to reduce VMT impacts to below the regional threshold. The incremental increase in housing units that would occur over the life of the proposed Housing Element, and the associated VMT, would not be cumulatively considerable. Therefore, the programmatic VMT impact would be less than significant.

**c) No Impact.** The proposed Housing Element Update does not authorize the construction of any roadway and would result in no effects on the design of existing or future streets. Therefore, it would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, there would be no impact.

**d) Less Than Significant Impact.** The proposed Housing Element Update does not involve any road construction or any development activity and thus would not obstruct or restrict emergency access to or through the City. Future housing development facilitated by implementation of Housing Element policies would be subject to site plan review and approval during entitlement review and/or application for building permits. The Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Therefore, impacts involving emergency access would be less than significant with continued implementation of development review procedures.

### 4.21 – Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**A) Less than Significant Impact.** According to the General Plan, Commerce contains several known points of local and statewide historical and cultural interest, and three historic sites in Commerce are officially commemorated. The Uniroyal Tire Plant and the Pillsbury Mill are both listed on the State Register of Historical Places, and a plaque marks the site of Vail Landing Field, where Western Airlines began its West Coast passenger and airmail service. Additional sites of interest include the Union Pacific (East Los Angeles) Train Station; the Mount Olive, Russian Molokan Christian Spiritual Jumpers Lemente, and Mount Carmel ethnic cemeteries; and the 1942 Sleepy Lagoon Murder site. Because historic properties are not located on any of the identified Inventory Sites, implementation of the proposed Housing Element Update would not cause substantial adverse change in significance of a historical resource. Therefore, impacts would be less than significant.

**B) Less than Significant Impact.** Before the arrival of Spanish settlers in the 1700s, the area that would later become Commerce consisted of Tongva People that inhabited a village called Sejatnga near the current City of Whittier and the San Gabriel River. By 1806, the Tongva were providing conscripted labor for Spanish missions. The area was part of the early Spanish rancho of Jose Manuel Nieto, the holder of the largest Spanish land grant in California, stretching from the Pacific Ocean to the Puente Hills.

Similar to potential impacts resulting from the effects of future housing development on historical resources, impacts to archaeological resources can result in the loss of information important to the history (and potentially the pre-history) of California and the people who created and/or used the materials. The potential for uncovering significant resources at identified Inventory Site locations during construction activities is unknown given that no such resources have been discovered and/or recorded previously. The General Plan states that archaeological and historical resources shall be protected and preserved to the maximum extent feasible.

Two changes to State law (SB 18 and AB 52) require cities to consult directly with local Native American tribes to determine if any tribal cultural resources would be impacted by private development or public works projects proposed in the City. As required by the General Plan Conservation Element, all future development of the Inventory Sites would be required to prepare Cultural Resource Assessments (CRAs) to determine if there would be any impacts to cultural or tribal cultural resources. This is considered regulatory compliance and not specific mitigation under CEQA.

The General Plan EIR concluded that build out of the General Plan would not result in less than significant impacts related to an substantial adverse change in the significance of archaeological resources. The proposed Housing Element Update does not include any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long-term impacts in the City have already been contemplated, and the proposed Housing Element Update would not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites would be subject to General Plan requirements and environmental evaluation pursuant to CEQA. Therefore, impacts related to implementation of the proposed Housing Element Update would be less than significant at this programmatic level.

### 4.22 – Utilities and Service Systems

Would the project:

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

**a) Less than Significant Impact.** The City Public Works Department manages water service and wastewater collection services to City residents and businesses. Wastewater treatment is provided by the County Sanitation Districts of Los Angeles County. The City also operates and maintains storm drains within its boundaries, although downstream flows are handled through regional facilities provided by the Los Angeles County Flood Control District. Southern California Edison (SCE) provides electricity to residents and businesses in the City of Commerce via power poles and power lines. Natural gas is provided by the Southern California Gas Company.



Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. Future housing under the proposed Housing Element Update would eventually consume additional water, electricity, and natural gas while producing additional wastewater for conveyance and treatment. The proposed Housing Element Update does not propose specific development on any specific Inventory Site at this time; therefore, it is consistent on a programmatic level with the General Plan growth projections which were evaluated in the General Plan EIR. The various involved utility agencies and companies develop master service plans based on anticipated land uses outlined in the General Plans of the various jurisdictions they serve. In addition, future development is required to assure adequate utility service during the development review and CEQA process. Therefore, utility impacts would be less than significant at this programmatic level.

**b) Less Than Significant Impact.** The Commerce Public Works Department provides domestic water service to City residents and businesses. The City overlies the Central (groundwater) Basin which was adjudicated in 1965 and the Central Basin Watermaster manages groundwater supplies and replenishment. The City Public Works Department regularly reviews and updates its Urban Water Management Plan (UWMP) and coordinates with the Central Basin Watermaster and MWD to assure it can provide adequate water service to the City under all anticipated conditions.

As outlined in Threshold 4.19.4 above, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The proposed Housing Element Update does not include specific development at this time, so programmatic impacts of new housing growth under the HEU would not exceed that identified in the General Plan and evaluated in the General Plan EIR. The City's UWMP is based on the General Plan and the MWD's master water planning is based on adopted land use plans in the General Plans of the cities that utilize Central Basin groundwater. Therefore, at a programmatic level the project would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

**c) Less Than Significant Impact.** Wastewater treatment is provided by the County Sanitation Districts of Los Angeles County (CSDLAC). Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation and increased housing capacity that would result. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. Future housing under the proposed Housing Element Update would eventually generate increased demand for wastewater treatment. However, the proposed Housing Element Update does not propose specific development on any specific Inventory Site at this time. Future housing development would be subject to preliminary environmental review pursuant to CEQA and, if found not to be exempt, subject to full environmental analysis. At that time, should potentially significant wastewater treatment impacts be identified, all environmental issues would be vetted and appropriate mitigation incorporated, as needed. Future housing under the proposed Housing Element Update would generate additional wastewater for conveyance and treatment. In addition, future development would be required to assure adequate wastewater service during the development review and CEQA process. Therefore, wastewater treatment impacts would be less than significant at this programmatic level.

**d) Less than Significant Impact.** The City of Commerce provides solid waste management for its residents and businesses although it contracts with Athens Services for collection services. Future development under the proposed Housing Element Update would be required to comply with

established solid waste regulations and procedures. Therefore, the proposed project would have no solid waste impacts at this programmatic level.

**e) Less than Significant Impact.** All new development in the City would be required to comply with state mandates and City regulations regarding reduction/recycling of household waste. As outlined in Thresholds 4.19.a and 4.19.b above, the Housing Element itself does not propose any specific development on specific sites at this time, and the subsequent General Plan and zoning ordinance amendments needed to implement the Housing Element would be subject to a new and separate CEQA review process. In addition, none of the housing strategies in the proposed Housing Element Update would have any effect upon or result in any conflicts with solid waste disposal regulations. Therefore, a less than significant impact would occur.

### 4.23 – Wildfire

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk of that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) No Impact.** As noted by CALFIRE Fire Hazard Severity Zone Maps, the planning area is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.<sup>20</sup> The proposed Housing Element Update does not involve any road construction or any development activity and thus would not obstruct or restrict emergency access to or through the City. Future housing development facilitated by implementation of Housing Element policies would be subject to site plan review and approval during entitlement review and/or application for building permits. The Los Angeles County Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Therefore, impacts involving emergency access would be less than significant with continued implementation of development review procedures.

**b) No Impact.** The City is relatively flat and is completely urban so there is little or no chance of a wildfire event affecting the City. The proposed Housing Element Update would allow the eventual construction of new housing in the City that may be subject to urban fires. However, there are no conditions in the City that would exacerbate wildfire risks and expose project occupants to, pollutant

concentrations from wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. Therefore, there would be no impacts.

**c) No Impact.** The City of Commerce is in a fully urbanized setting and does not have a moderate or high risk of wildfires. The City already has full infrastructure (roads, water lines with fire hydrants, etc.) to support fire protection services. Therefore, the proposed Housing Element Update would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impacts would occur.

**d) No Impact.** The City is relatively flat and bordered by the Los Angeles River to the west and the Rio Hondo River to the east. Both of these channels are fully improved adjacent to the City. Sections 4.9.c and 4.9.d of this Initial Study concluded that future housing in the City under the Housing Element would not experience significant impacts from flooding. The proposed Housing Element Update would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

**4.24 – Mandatory Findings of Significance**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Less Than Significant Impact.** The results of the preceding analysis indicate that the proposed Housing Element Update would have less-than-significant impacts to sensitive biological, historical, archaeological, and paleontological resources. In addition, programmatic impacts of the proposed project to scenic vistas and visual character and resources would be less than significant. Subsequent to adoption of the Housing Element, the City would amend the General Plan and zoning ordinance/map to provide sufficient capacity to accommodate the RHNA allocation. This subsequent General Plan and zoning ordinance amendment process would be subject to a new and separate CEQA review process. The proposed Housing Element Update does not include specific development on any of the identified Inventory Sites at this time; therefore, it is consistent on a programmatic level with the General Plan growth projections which were evaluated in the General Plan EIR. Considering the programmatic level of analysis would not authorize any development plan, redevelopment of any existing sites, or construction of new infrastructure, and would not change existing City land use policy regarding locations or intensities of development, it would not result in any effects that would degrade the quality of the environment. Therefore, the City finds that the Housing Element Update’s programmatic impacts related to degradation of the environment would be less than significant.

**b) Less Than Significant Impact.** Cumulative effects resulting from full implementation of City land use policies were evaluated in the General Plan EIR. The proposed Housing Element Update would not change any of these policies and does not propose any specific development or redevelopment

project that could contribute to short-term or long-term cumulative impacts that were not addressed sufficiently in the General Plan EIR. The discussion in Threshold 4.21.a above demonstrates that the Housing Element is consistent with the programmatic analysis in the General Plan EIR. Therefore, the City finds that the proposed Housing Element Update's individual contribution to potentially significant cumulative impacts is not considerable.

**c) Less Than Significant Impact.** As supported by the preceding environmental evaluation, the proposed Housing Element Update would not result in substantial adverse effects on human beings. It has been determined through quantitative and qualitative analysis supported by substantial evidence that the proposed Housing Element has been determined to have less than significant impacts on people or the environment as evaluated and substantiated in the 20 preceding environmental topics. Therefore, the City hereby finds that direct and indirect impacts on human beings would be less than significant.

### **5.1 – List of Preparers**

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- Bob Prasse, Director of Environmental Services
- Cameron Hile, Senior Analyst

### **5.2 – Persons and Organizations Consulted**

- N/A

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**Appendix A Draft City of Commerce 2021-2029 Housing Element Update**

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# CITY OF COMMERCE

## 2021-2029 HOUSING ELEMENT



Revised Draft

~~July~~ December 2023

February 2024

Economic Development & Planning

2535 Commerce Way

Commerce, CA 90040



## Chapter 1: Introduction

### Introduction

The Housing Element establishes the City's housing policies for the planning period of October 15, 2021 through October 15, 2029. It guides City officials in decision making and sets forth an action plan to implement the housing goals. This Housing Element is intended to direct residential development and preservation in a manner consistent with the Commerce General Plan and overall requirements of the State Housing Element law.

### Scope and Context

Building on a housing needs assessment and evaluation of the City's housing programs, available land, and constraints on housing production, this Housing Element presents a comprehensive set of housing policies and programs. The Housing Element is organized to address all of the topics required by the Government Code and State Housing Element guidelines. Specifically, the Element contains the following discussions:

- Population and employment trends;
- Household characteristics;
- Special housing needs;
- Governmental and non-governmental constraints;
- Opportunities for energy conservation;
- Existing assisted housing developments;
- Goals, policies, and quantified housing objectives;
- Housing Programs (Government Code Section 65583); and
- Affirmatively Furthering Fair Housing (AFFH).

### Relationship to Other General Plan Elements

The City of Commerce 2020 General Plan (General Plan) was adopted in January 2008. In addition to the Housing Element, the General Plan also includes the following elements: (1) Community Development, (2) Transportation, (3) Resource Management, (4) Safety and (5) Air Quality. The City is conducting a comprehensive update to the General Plan. The new update will include a new element - Environmental Justice. This Housing Element is consistent with the proposed land use policy of the General Plan update and policies in the Environmental Justice Element also help shape the City's meaningful actions to affirmatively further fair housing. During the overall plan update, the City will ensure internal consistency among the various elements of the General Plan. [The main tool to](#)

verify consistency between the elements will be the Annual Progress Report submitted to HCD.

## Public Outreach

Government Code § 65583 (c)(7) states that, “[t]he local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.”

A series of community engagement events have occurred over 5 years discussing housing issues and opportunities. The engagement events include traditional workshops, pop up events, online surveys, online questionnaires, focus/stakeholder meetings, and formal advisory group meetings. The events have been advertised on the City’s general website, General Plan Update website, social media, eblasts, emails, and USPS mail.

The City’s General Plan Update website, [www.reimaginecommerce.com](http://www.reimaginecommerce.com), includes information on outreach opportunities, schedules and draft documents.

The housing related community events are listed below. Meeting materials, presentations, invitations/flyers (English and Spanish), engagement summaries are included in Appendix A.

- Envision Commerce General Plan Pop Up Workshops: September 2018
- Envision Commerce General Plan Advisory Committee Meetings: December 2018, July 2019, August 2019, September 2019, November 2019
- Housing Element Focus Group/Stakeholders Meeting: November 2022
- Online Housing Element Survey: November and December 2022
- Housing Element Workshop: February 2023
- Online Housing Workshop Questionnaire: March 2023

The community input identified these key themes, which the draft housing element has addressed.

- Lack of affordable and “missing middle” housing
- Lack of tenants’ rights protection
- Limited housing sites due to air quality issue, site contamination issues, industrial zoned land
- Deferred building maintenance increases housing rehabilitation costs
- Minimum density requirements are not flexible enough for small lot development
- Need to incentivize housing development



- Housing opportunities: civic centers, adaptive reuse of warehouses and motels, along commercial corridors, retrofitting underutilized office space, Citadel/Casino, live/work, mixed use, modular homes, Rosewood Park area, Veteran’s Park area, TOD near proposed Metro light-rail station
- Prioritize housing a) affordable to families, b) residents who grew up in Commerce, c) large families, d) young homeowners, e) low income residents, and f) seniors
- Include housing stock rehabilitation
- Establish mortgage loan programs/support programs for homeowners at risk of mortgage default
- Certain requirements inhibit the unhoused and at-risk residents from securing housing (i.e. credit checks)
- Need ADU policy

The Draft Housing Element was available for public review from May 25, 2023 through June 26, 2023. The City also held a community workshop on May 31, 2023 to review the Draft Housing Element and to receive public input. Comments received during the 30-day review and at the workshop are summarized at the end of Appendix A.

### **Comments Received During First HCD Submittal Review Period**

The City of Commerce submitted a draft Housing Element to HCD for review on July 10, 2023. In November HCD staff received an email from David Kellogg, representing a group of residents from the Bay Area and San Bernardino. The letter addressed the following issues:

- The Housing Element fails to adequately analyze compliance with the state’s streamlining laws.
- CEQA determinations related to housing projects, including CEQA-exempt projects.

The Commerce Housing Element includes a program for the City to establish a standard procedure for processing SB 35 eligible projects and to comply with SB 330, pursuant to State law.

Regarding CEQA, the City complies with all State requirements related to environmental review timelines. The City has only had a few housing development projects in recent years (Rosewood Village and Modelo Specific Plan) and these projects required CEQA review.

## Sources of Information

The City used a variety of data sources for the compilation of demographic, housing, and socio-economic data, including the:

- American Community Survey (ACS) 5-Year Estimates by the U.S. Census Bureau;
- U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports (based on the 2015-2019 ACS)
- California Department of Finance, E-5 Series Population and Housing Estimates;
- Southern California Association of Governments (SCAG) information on the City's Regional Housing Needs Assessment (RHNA); and
- Los Angeles Homeless Services Authority (LAHSA) information on persons experiencing homelessness.

## CHAPTER 2: COMMUNITY PROFILE

The City of Commerce is a unique jurisdiction that presents both opportunities and barriers to affordable housing. Incorporated in 1960, the City is located six miles east of downtown Los Angeles and bordered by Bell, Bell Gardens, Downey, East Los Angeles, Montebello and Vernon. The City's mix of residential areas, retail stores, business parks, manufacturing, and entertainment venues allows the city to provide high quality services for City residents while maintaining a pro-business climate. The City is primarily made up of industrial uses (more than 60 percent of Commerce's total land area is industrial), which presents challenges to both the identification of new sites for development and the maintenance of existing residential neighborhoods.

This section of the Housing Element provides an overview of the demographic, housing, and socio-economic characteristics of the City of Commerce. Topics covered include the City's:

- Residential Neighborhoods;
- Population Characteristics;
- Employment Characteristics;
- Household Characteristics;
- Housing Stock Characteristics;
- Housing Costs, Household Income and Ability to Pay for Housing;
- Special Needs Housing;
- Affordable Housing Units At-Risk of Converting to Market Rate; and
- Regional Housing Needs Allocation

### Sources of Information

The City used a variety of data sources for the compilation of demographic, housing, and socio-economic data, including the:

- American Community Survey (ACS) 5-Year Estimates by the U.S. Census Bureau;
- U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports (based on the 2015-2019 ACS)
- California Department of Finance, E-5 Series Population and Housing Estimates;
- Southern California Association of Governments (SCAG) information on the City's Regional Housing Needs Assessment (RHNA); and

- Los Angeles Homeless Services Authority (LAHSA) information on persons experiencing homelessness.

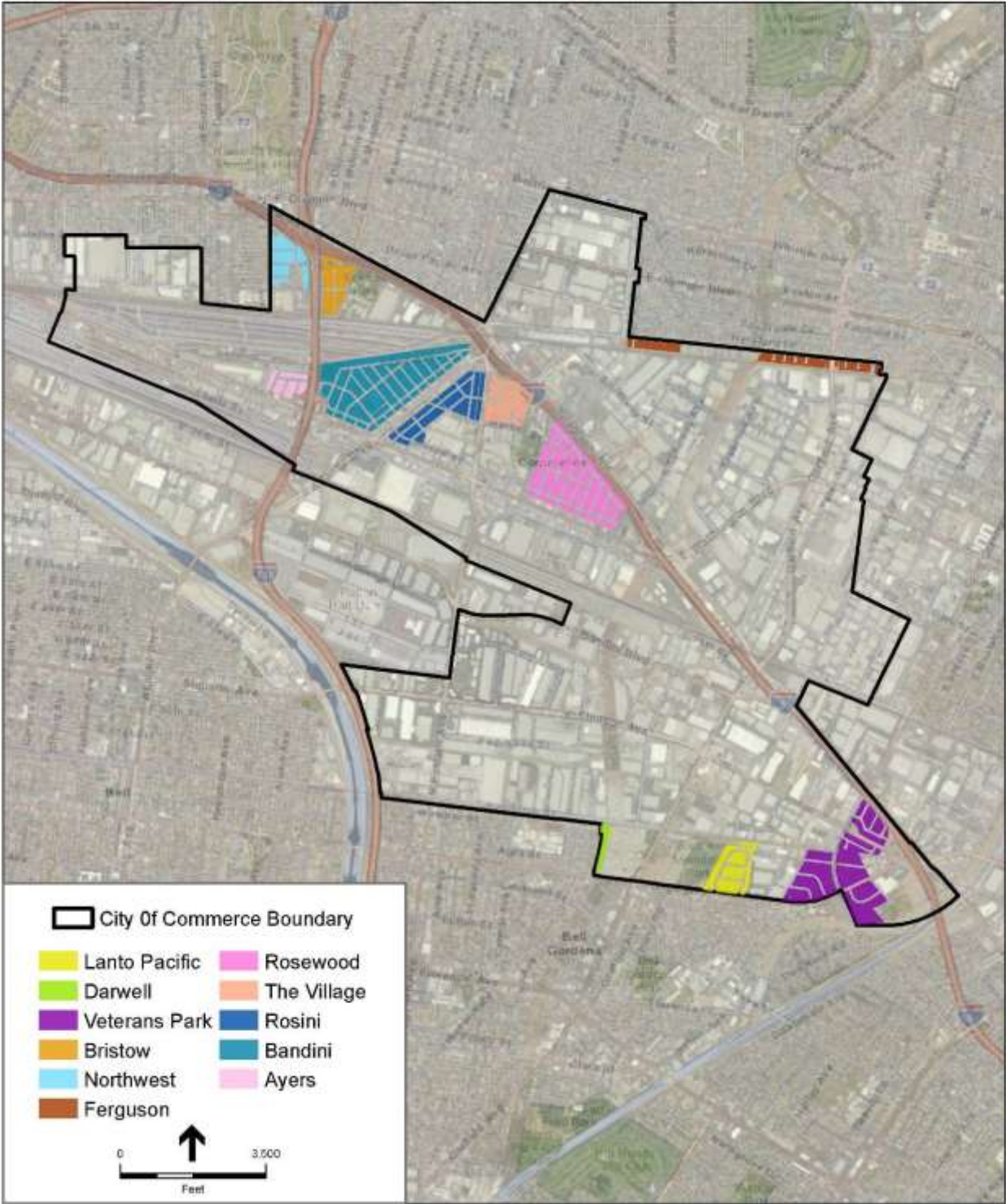
Some of these sources provide data on the same topic, but because of different methodologies, the resulting data differ. For example, the decennial census and ACS report slightly different estimates for the total population, number of households, number of housing units, and household size. This is in part because ACS provides estimates based on a small survey of the population taken over the course of the whole year. Because of the survey size and seasonal population shifts, some information provided by the ACS is less reliable. For this reason, the readers should keep in mind the potential for data errors when drawing conclusions based on the ACS data used in this chapter. The information is included because it provides an indication of possible trends.

## Commerce Residential Neighborhoods

Commerce has eleven established residential neighborhoods. These are listed below and shown on Figure 2-1.

- Ayers neighborhood, in the northwestern portion of the City
- Bandini neighborhood, also in the northwestern portion of the City
- Bristow neighborhood, in the northern tip of the City where the I-710 meets the I-5
- Northwest neighborhood, in the northern tip of the City, west of the Bristow neighborhood
- Darwell neighborhood, located at the southwestern border of the City
- Ferguson neighborhood, in the northern half of the City along the railroad tracks
- Lanto Pacific neighborhood along the City's southern boundary
- Rosewood neighborhood in the center of the City adjacent to the I-5
- Rosini neighborhood also in the center of the City east of Atlantic Boulevard
- Village neighborhood in the center of the City south of Atlantic and Eastern Avenues
- Veterans Park neighborhood in the southern tip of the City

Figure 2-1: Commerce Residential Neighborhoods



Source: City of Commerce, ESRI Basemaps

## Population Characteristics

The City of Commerce had a population of 12,888 residents in 2020 (see Table 2-1). This was a marginal increase of 0.5 percent from 2010, when the population was 12,823. While lower than the County overall, Commerce's growth was similar to other jurisdictions in the area such as Downey and Pico Rivera. Between the years 2000 and 2010, Commerce grew by a modest two percent. However, places such as Bell, Maywood and Pico Rivera saw a population decrease during this same time period.

The Southern California Association of Governments (SCAG) has estimated population growth through the year 2045 for cities and counties in the region. Commerce is anticipated to increase by approximately 900 residents, or seven percent, by 2045. This growth is comparable to many neighboring cities but lower than the County overall (15 percent).

**Table 2-1: Population Growth and Forecasts - Commerce and Surrounding Communities**

	2000	2010	2020	2045	Percentage Change 2000-2010	Percentage Change 2010-2020	Projected Change 2020-2045
Bell	36,664	35,477	36,475	37,100	-3.2%	2.8%	1.7%
<b>Commerce</b>	<b>12,568</b>	<b>12,823</b>	<b>12,888</b>	<b>13,800</b>	<b>2.0%</b>	<b>0.5%</b>	<b>7.1%</b>
Downey	107,323	111,772	112,186	119,200	4.1%	0.4%	6.3%
Maywood	28,083	27,395	27,837	29,000	-2.4%	1.6%	4.2%
Montebello	62,150	62,500	63,264	67,800	0.6%	1.2%	7.2%
Pico Rivera	63,428	62,942	63,530	67,400	-0.8%	0.9%	6.1%
Los Angeles County	9,519,330	9,818,605	10,135,614	11,674,000	3.1%	3.2%	15.2%

Sources: California Department of Finance E-5 series; 2045 population projections are from SCAG Connect SoCal Growth Forecast Technical Report, Adopted on Sept. 3, 2020.

## Age Composition

The distribution of age groups in a community shapes what types of housing the community may need in the near future. An increase in the older population may signal a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. In Commerce, the median age in 2010 was 28.1; by 2020, this figure had increased significantly to 37.5 years. Los Angeles County is similar with a median age of 36.7 in 2020.

The proportion of residents 18 years and younger has decreased over the last decade, while the remaining age groups increased. The percentage of residents age 65 and older almost doubled over ten years, from 9 percent in 2010 to 18 percent in 2020. The age



distribution in Commerce is similar to that of the County overall, although the County's adult population is slightly higher than Commerce (62 percent versus 58 percent), while the senior population is slightly lower (14 percent versus 18 percent).

**Table 2-2: Age Distribution**

	2010		2020		Los Angeles County
	Number	Percentage	Number	Percentage	
Total Population	12,758	--	12,738	--	
Under 5 years	940	7.4%	508	4.0%	5.9%
5 to 19 years	3,942	30.9%	2,524	19.8%	18.4%
20 to 64 years	6,701	52.5%	7,421	58.3%	62%
65 years and over	1,174	9.2%	2,285	17.9%	13.7%
Median Age	28.1		37.5		36.7

Source: 2006-2010 and 2016-2020 ACS, Table DP05

## Race/Ethnicity

A community's racial and ethnic composition may have implications for housing needs to the extent that different groups have different household characteristics and cultural backgrounds that may affect housing needs and preferences. As shown in Table 2-3, Hispanic or Latino residents made up approximately 95 percent of the City's population in 2020. This is an increase of approximately four percent from 2010, when Hispanic or Latinos comprised just over 91 percent of Commerce's population. Whites make up about two percent of the population while all other racial and ethnic groups are less than one percent.

Commerce is much more homogeneous than Los Angeles County as a whole. Table 2-3 illustrates that the County's population is 48 percent Hispanic or Latino, 26 percent White, 15 percent Asian, and 8 percent African American. Approximately 3 percent of residents identify as two or more races in the County and other racial and ethnic groups each comprise less than one percent of the County's overall population.

**Table 2-3: Race and Ethnicity**

Race/Ethnicity	2010		2020		
	Number	Percentage	Number	Percentage	Los Angeles County
Hispanic or Latino <sup>1</sup>	11,644	91.3%	12,123	95.2%	48.3%
Non-Hispanic or Latino	1,114	8.7%	615	4.8%	51.7%
White	420	3.3%	298	2.3%	25.9%
Black/African American	249	2.0%	85	0.7%	7.8%
American Indian and Alaska Native	15	0.1%	93	0.7%	0.2%
Asian	231	1.8%	112	0.9%	14.6%
Native Hawaiian and Other Pacific Islander	41	0.3%	0	0.0%	0.2%
Some other race alone	0	0.0%	8	0.1%	0.4%
Two or more races	158	1.2%	19	0.1%	2.6%

Source: 2006-2010 and 2016-2020 ACS, Table DP05

Note:

1. Individuals having Hispanic/Latino ethnic background may be of any race; therefore, individuals included in the racial categories in this Table are those that did not identify Hispanic/Latino as their ethnicity.

## Employment Characteristics

Commerce has approximately 5,720 residents age 16 or older actively working in the civilian labor force (Table 2-4). Residents living in the City of Commerce are employed in a diverse number of industries, with approximately 26 percent of the population employed in sales and office occupations, 23 percent in service occupations, 21 percent in management, business, science and arts occupations, 20 percent in production, transportation and material moving occupations and 10 percent in natural resources, construction, and maintenance occupations.

Table 2-4 also shows the median annual income from the occupations of Commerce residents. Management, business, science, and arts occupations have the highest annual income (\$47,604). Approximately one half of Commerce residents (49 percent) are employed in occupations that earn less than \$30,000 annually. Household income and the ability to pay for housing is discussed later in this chapter.



**Table 2-4: Occupations and Median Salaries (2020)**

Occupations	2020		Median Annual Earnings
	Number	Percentage	
Management, business, science, and arts occupations	1,171	20.5%	\$47,604
Service occupations	1,315	23.0%	\$21,403
Sales and office occupations	1,480	25.9%	\$26,091
Natural resources, construction, and maintenance occupations	593	10.4%	\$39,890
Production, transportation, and material moving occupations	1,161	20.3%	\$31,991
Total	5,720	100.0%	\$31,706

Source: 2016-2020 ACS, Table S2401 and S2411

Table 2-5 shows the top ten employers in the City of Commerce. California Commerce Club, Inc., or the Commerce Casino, has the largest number of employees (4,750). The County of Los Angeles and Parsec, Inc. each have over 1,000 employees.

**Table 2-5: Top Employers in Commerce**

Employer	Number of Employees
California Commerce Club, Inc.	4,750
County of Los Angeles	1,100
Parsec, Inc.	1,036
Acco Engineered Systems	705
American International Industries	642
99 Cent Only Stores	635
Mission Foods	532
JWCH Institute Inc.	521
Capstone Logistics LLC.	447
Wine Warehouse	426

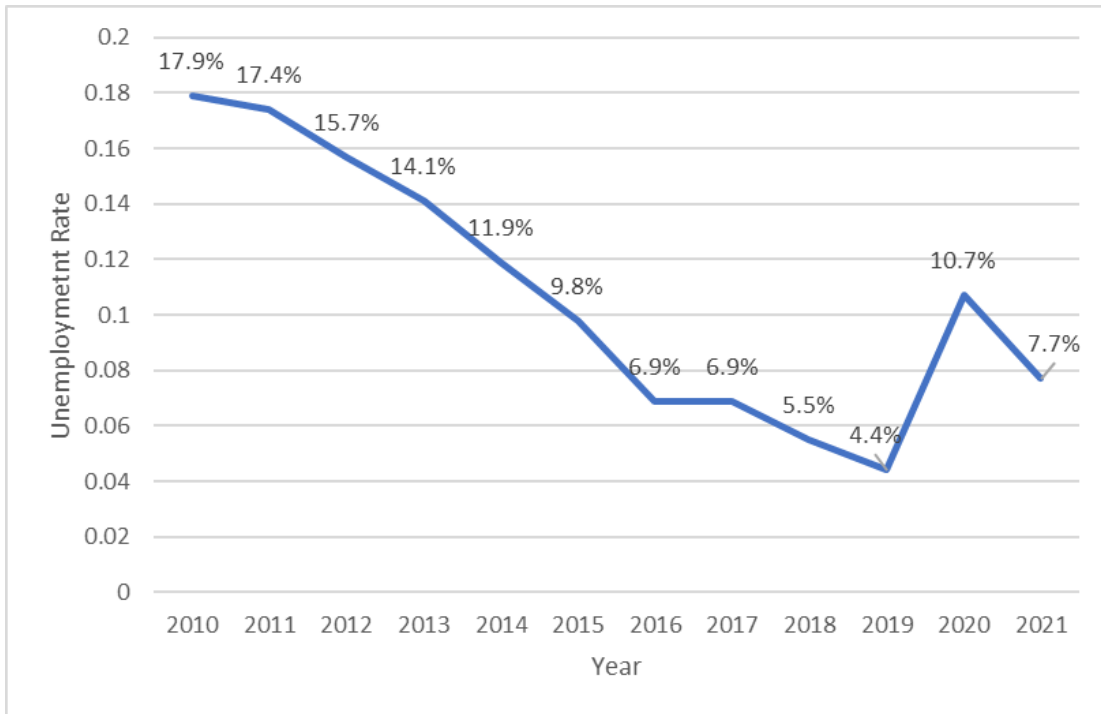
Source: City of Commerce Demographic Profile website, [https://animateddemographics.com/commerce/top\\_employers](https://animateddemographics.com/commerce/top_employers), accessed October 2022

## Unemployment

In Commerce, the unemployment rate decreased from 18 percent in 2010 to 8 percent in 2021 (Figure 2-2). The unemployment rate had been steadily decreasing until 2020, which experienced a sharp spike in unemployment, likely due to impacts related to the COVID-

19 pandemic. The unemployment rate has decreased significantly since the 2020 peak, falling to below 8 percent in 2021 and below 4 percent by November 2022, as reported by the California Employment Development Department.

**Figure 2-2: Unemployment Rates in Commerce (2010 – 2021)**

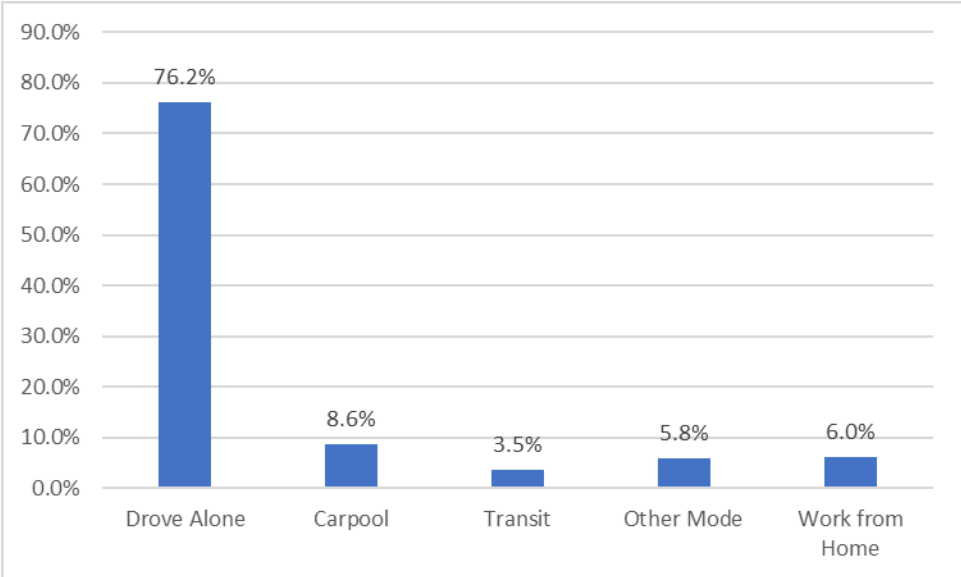


Source: California Employment Development Department (<https://www.labormarketinfo.edd.ca.gov>)

### Commuting Patterns

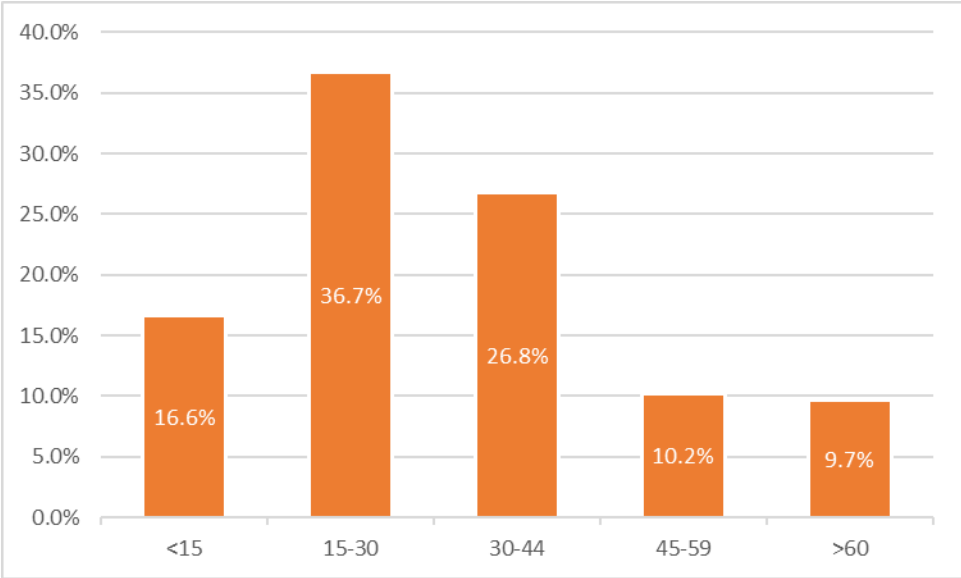
Figure 2-3 and Figure 2-4 show the commuting patterns of Commerce residents. More than 76 percent of residents drive to work alone, while approximately nine percent carpool, six percent work from home, six percent use another mode and four percent use transit. In terms of distance, the largest percentage of residents (37 percent) commute between 15 and 30 minutes while 27 percent travel between 30 and 44 minutes. Approximately ten percent of residents have a commute of an hour or greater.

**Figure 2-3: Means of Transportation to Work**



Source: 2016-2020 ACS, Table DP03

**Figure 2-4: Travel Time to Work (Minutes)**



Source: 2016-2020 ACS, Table S0801

## Household Characteristics

### Household Tenure

The U.S. Census Bureau defines a household as all persons who occupy a housing unit, including families, single people, or unrelated persons. Persons living in licensed facilities or dormitories are not considered part of the same household. As of 2020, there were 3,503 households in Commerce, an increase of 13 percent, from 2010. Of these 3,503 households, 55 percent own the home they live in and 45 percent rent (Table 2-6). The ownership rate has increased by 22 percent since 2010. The percentage of homeowners in Commerce is higher than the County overall (55 percent versus 47 percent).

**Table 2-6: Households by Tenure**

Tenure	2010		2020		
	Households	Percent	Households	Percent	LA County
Owner	1,587	51.3%	1,933	55.2%	46.5%
Renter	1,507	48.7%	1,570	44.8%	53.5%
Total Occupied	3,094		3,503		

Source: 2006-2010 and 2016-2020 ACS, Table DP04

### Household Types and Size

Approximately three-quarters (77 percent) of households in Commerce consist of married-couple families with or without children. Families with children comprise 32 percent of City households, which is a decrease from 47 percent in 2010. During the same time period, the number of families without children increased (37 percent in 2010 compared to 45 percent in 2020) as did single households (13 percent in 2010 compared to 20 percent in 2020). The number of other non-families increased by 11 households during the last decade.

**Table 2-7: Household Types**

Household Type	2010		2020	
	Number	Percent	Number	Percent
Families	2,563	82.8%	2,680	76.5%
with children	1,441	46.6%	1,109	31.7%
with no children	1,122	36.3%	1,571	44.8%
Singles	416	13.4%	697	19.9%
Other non-families	115	3.7%	126	3.6%
Total Households	3,094	100.0%	3,503	100.0%
Average Household Size	3.89		3.61	

Source: 2006-2010 and 2016-2020 ACS, Table DP02 and S1101

According to the 2020 ACS, the average household size in Commerce is 3.61 persons, a decrease from 3.89 in 2010 (Table 2-7). This change is most likely due to the number of families with children decreasing while single households (especially senior households) increased in the last decade. Table 2-8 shows the average household size of the surrounding communities and LA County. Commerce is similar to many neighboring cities and all of these cities have a greater household size than Los Angeles County's average household size of 2.96.

**Table 2-8: Average Household Size – Commerce and Surrounding Communities**

Jurisdiction	Household Size
Bell	3.85
<b>Commerce</b>	<b>3.61</b>
Downey	3.31
Maywood	4.00
Montebello	3.30
Pico Rivera	3.64
Los Angeles County	2.96

Source: 2016-2020 ACS, Table S1101

## Overcrowding

Overcrowded housing is defined by the State Housing and Community Development department (HCD) as units with more than one inhabitant per room, excluding kitchens and bathrooms. Units with more than 1.5 persons per room are considered severely overcrowded. In 2020, as shown in Table 2-9, the incidence of overcrowding in Commerce was 13 percent for owner-occupied units and 19 percent for rental units. Severe overcrowding impacted one percent of owner-occupied units and eight percent of rental units. Overcrowding in Commerce is higher than Los Angeles County (16 percent compared to 11 percent).

Overcrowding is an important housing issue for the City to monitor as overcrowded households can lead to neighborhood deterioration due to the intensive use of individual housing units leading to excessive wear and tear, and the potential cumulative overburdening of community infrastructure and service capacity. Furthermore, overcrowding in neighborhoods can lead to an overall decline in social cohesion and environmental quality. Such decline can often spread geographically and impact the quality of life and the economic value of property and the vitality of commerce within a City.

**Table 2-9: Overcrowding By Tenure**

	Owner-Occupied	Renter-Occupied	All Households	Los Angeles County
Overcrowded (>1 person per room)	13.3%	19.1%	15.9%	11.2%
Severely Overcrowded (>1.5 persons per room)	1.0%	8.4%	4.3%	4.7%
Total Households	1,933	1,570	3,503	3,332,504

Source: 2016-2020 ACS, Table B25014

## Housing Stock Characteristics

### Housing Unit Growth and Type

Based on data from the California Department of Finance (DOF), Commerce had 3,524 housing units in 2021 (

Table 2-10). This was an increase of 54 units (1.6 percent) from 2010. Commerce and surrounding cities had similar modest growth, with the exception of Maywood, which had a decrease in housing units. Countywide, there was a five percent increase in housing units between 2010 and 2021.

**Table 2-10: Housing Growth –  
Commerce and Surrounding Communities**

	2010	2021	Percent Change 2010-2021
Bell	9,217	9,482	2.9%
<b>Commerce</b>	<b>3,470</b>	<b>3,524</b>	<b>1.6%</b>
Downey	35,601	36,202	1.7%
Maywood	6,766	6,717	-0.7%
Montebello	19,768	20,380	3.1%
Pico Rivera	17,109	17,462	2.1%
Los Angeles County	3,443,087	3,635,136	5.6%

Source: California Department of Finance, E-5 series (4/1/2010 and 1/1/2022)

Table 2-11 shows the types of the housing units in Commerce. Single-family homes are the predominant housing type in the City (78 percent). Detached single-family units increased by 33 units between 2010 and 2021, while attached single-family units increased by five units during the same time period. In 2021, multi-family units made up approximately 22 percent of the total housing in the City. Between 2010 and 2021, an additional 16 multi-family units were added to Commerce’s housing stock.

**Table 2-11: Housing Unit Type**

Housing Type	2010		2021		Change	
	No. of Units	Percent of Units	No. of Units	Percent of Units	No. of Units	Percentage
<b>Single-Family Units</b>						
Detached Single-Family	2,376	68.5%	2,409	68.4%	33	1.4%
Attached Single-Family	331	9.5%	336	9.5%	5	1.5%
<b>Multiple-Family Units</b>						
Multiple-Family Units (2 to 4 units)	232	6.7%	239	6.8%	7	3.0%
Multiple-Family Units (5 or more)	531	15.3%	540	15.3%	9	1.7%
Mobile Homes	0	0.0%	0	0.0%	0	---
<b>Total, All Housing Types</b>	<b>3,470</b>	<b>100.0%</b>	<b>3,524</b>	<b>100.0%</b>	<b>54</b>	<b>1.6%</b>

Source: California Department of Finance E-5 series (4/1/2010 and 1/1/2022)

### Age and Condition of Housing Stock

Table 2-12 shows when the housing stock was built in Commerce. A general rule in the housing industry is that structures older than 30 years begin to show signs of deterioration and require reinvestment to maintain their quality. Over 85 percent of the City’s housing units were built prior to 1990 and are at least 30 years old. Approximately 65 percent of the housing stock in Commerce was built prior to 1970 making these units 50 years or older.

It should be noted that the information in Table 2-12 is from the 2016-2020 ACS, which is a sample extrapolated to represent the community. As described in Table 2-11 above, the City had 54 units built between 2010 and 2021.

**Table 2-12: Year Structure Built**

Year Constructed	Units	Percent
2014 or later	0	0.0%
2010 to 2013	0	0.0%
2000 to 2009	243	6.7%
1990 to 1999	252	7.0%
1980 to 1989	345	9.6%
1970 to 1979	409	11.3%
1960 to 1969	291	8.1%
1950 to 1959	858	23.8%
1940 to 1949	901	25.0%
1939 or earlier	311	8.6%
Total housing units	3,610	100%

Source: 2016-2020 ACS, Table DP04

### Substandard Housing Conditions

The 2020 ACS provides data about the condition of the City’s existing housing stock (Table 2-13). In general, the condition of the housing stock in Commerce is good. None of the owner-occupied units in the City have substandard conditions (lacking plumbing and/or kitchen facilities) and less than one percent of renter-occupied units lack complete kitchen facilities. The substandard conditions in Commerce are lower than Los Angeles County.



**Table 2-13: Lack of Complete Facilities By Tenure**

Facility Type	Owner-Occupied	Renter-Occupied	Total Households	Los Angeles County
Lacking complete kitchen facilities	0.0%	0.9%	0.4%	1.6%
Lacking complete plumbing facilities	0.0%	0.0%	0.0%	0.5%
<b>Total Households</b>	1,933	1,570	3,503	3,332,504

Source: 2016-2020 ACS, Tables B25049 and B25053

The City's Code Enforcement division is complaint driven. Between July 1, 2020 and June 30, 2023, 701 residential cases were opened. The reasons for those cases are as follows:

- 5 Zoning Cases
- 6 Business License Violations
- 14 Garage Conversions Violations
- 8 Hazardous Conditions
- 5 Health and Welfare Violations
- 28 Illegal Constructions
- 7 Permit Violations
- 628 Public Nuisance Violations

Code Enforcement conducted a windshield survey of the residential areas of the city and estimated that there are 180 to 200 housing units in need of rehabilitation or replacement. This represents approximately five to six percent of the City's total housing units. Most residential Code Enforcement cases are concentrated within the Bandini neighborhood in the northwestern portion of the City.

The City's Neighborhood Fix Up Grant Program provides money for housing repairs and alterations that are visible from the street. The CDBG Home Preservation Grant Program provides funds to qualified applicants to complete improvements to their residence. The City's website includes information on the grant program's guidelines as well as an interest form for residents to fill out and submit to the Economic Development and Planning Department.

### Vacancy Rate Trends

Data from the 2020 ACS illustrates Commerce’s overall vacancy rate at 3.0 percent, with the homeowner vacancy rate at 0.8 percent and the rental vacancy rate at 1.9 percent. Compared to 2010, the vacancy rate for owner-occupied units dropped (from 2.1 percent to 0.8 percent) and the rate for rental-occupied units slightly increased (from 1.2 percent to 1.9 percent).

**Table 2-14: Vacancy Rates in Commerce**

	2010	2020
Homeowner vacancy rate	2.1%	0.8%
Rental vacancy rate	1.2%	1.9%
Overall vacancy rate	3.6%	3.0%

*Source: 2006-2010 and 2016-2020 ACS, Table DP02*

In general, a higher vacancy rate is considered necessary by housing experts to assure adequate choice in the marketplace and to temper the rise in home prices. A vacancy rate of 1.5 to two percent for ownership housing and five to six percent for rental housing is considered necessary to balance demand and supply for housing. As can be seen from Table 2-14, the vacancy rates in Commerce are lower than optimum. These percentages suggest that there are few vacant owner and rental housing units available for sale/rent in the City, which often results in higher housing prices and rents as demand far exceeds supply.

## Housing Costs, Household Income and Ability to Pay for Housing

### Household Income

Income is defined as wages, salaries, pensions, social security benefits, and other forms of cash received by a household. Non-cash items, such as Medicare and other medical insurance benefits, are not included as income. For housing to be considered affordable, housing costs should not exceed 30 percent of income. Housing costs include rent and utilities for renters, and principal, interest, property taxes, and insurance for homeowners. It is therefore critical to understand the relationship between household incomes and housing costs to determine whether housing is affordable for the City’s households.

An estimated 72 percent of Commerce households fall in the extremely low, very low, and low income categories, earning less than 80 percent of median income (Table 2-15). There is an even greater proportion (86 percent) of extremely low, very low, and low income households among renters. This substantial percentage of lower income households means that finding housing, particularly affordable housing, is a challenge for most Commerce residents.

**Table 2-15: Household Income Level By Tenure**

Income Category	Owner Households		Renter Households		Total Households	
	# of Households	Percentage	# of Households	Percentage	# of Households	Percentage
Extremely Low Income (<30% AMI)	265	16.0%	585	31.2%	850	24.0%
Very Low Income (31%-50% AMI)	365	22.0%	625	33.3%	990	28.0%
Low Income (51%-80% AMI)	295	17.8%	410	21.9%	705	19.9%
Median Income (81%-100%)	290	17.5%	75	4.0%	365	10.3%
Moderate and Above (>100% AMI)	445	26.8%	180	9.6%	625	17.7%
Total Households	1,660	100.0%	1,875	100.0%	3,535	100.0%

Source: U.S. Department of Housing and Urban Development (HUD), *Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2015-2019*; Data released September 9, 2022

Information on household income by household size is maintained by the U.S. Department of Housing and Urban Development (HUD) for each county and is updated annually. The California Department of Housing and Community Development (HCD) adjusts each county's median income to at least equal the state non-metropolitan county median income. The State Income Limits for 2022 were published in May 2022 and are shown below in Table 2-16.

In Los Angeles County, the median income for a family of four was \$91,100 in 2022. A household of four with an income less than \$35,750 is considered extremely low income.<sup>1</sup> Comparing this information to Table 2-15, 16 percent of owner-households and 31 percent of renter-households in Commerce are earning less than \$35,750. This information corresponds to the annual median incomes that were described in Table 2-4, including for sales, office, service, production and transportation occupations.

<sup>1</sup> California Department of Housing and Community Development, effective May 13, 2022.

**Table 2-16: Fiscal Year 2022 Los Angeles County Income Limits**

Household Size	Extremely Low (<30% AMI)	Very Low (30%-50% AMI)	Low (50%-80% AMI)	Median	Moderate (80%-120% AMI)
1-Person	\$25,050	\$41,700	\$66,750	\$63,750	\$76,500
2-Person	\$28,600	\$47,650	\$76,250	\$72,900	\$87,450
3-Person	\$32,200	\$53,600	\$85,800	\$82,000	\$98,350
<b>4-Person</b>	<b>\$35,750</b>	<b>\$59,550</b>	<b>\$95,300</b>	<b>\$91,100</b>	<b>\$109,300</b>
5-Person	\$38,650	\$64,350	\$102,950	\$98,400	\$118,050
6-Person	\$41,500	\$69,100	\$110,550	\$105,700	\$126,800
7-Person	\$44,350	\$73,850	\$118,200	\$112,950	\$135,550
8-Person	\$47,200	\$78,650	\$125,800	\$135,550	\$144,300

Source: California Department of Housing and Community Development, State Income Limits for 2022, May 13, 2022.

## Home Sales Prices

In 2021, the median home value in Commerce was \$532,000 per data from Dataquick (CoreLogic).<sup>2</sup> This median home value more than doubled from 2010 when it was \$226,000 and increased by more than 200 percent compared to home values in 2000 (Table 2-17). Large increases in home values occurred in all neighboring communities as well as Los Angeles County as a whole, which saw a 134 percent increase over the past decade.

**Table 2-17: Median Home Values in Commerce and Surrounding Communities**

	2000	2010	2021	Percent change 2000-2010	Percent change 2010-2021
Bell	\$147,000	\$228,500	\$498,500	55.4%	118.2%
<b>Commerce</b>	<b>\$164,500</b>	<b>\$226,000</b>	<b>\$532,000</b>	<b>37.4%</b>	<b>135.4%</b>
Downey	\$212,295	\$370,000	\$706,000	74.3%	90.8%
Maywood	\$149,500	\$198,500	\$459,500	32.8%	131.5%
Montebello	\$185,000	\$319,000	\$616,250	72.4%	93.2%
Pico Rivera	\$159,500	\$280,000	\$605,250	75.5%	116.2%
Los Angeles County	\$227,897	\$333,000	\$778,500	46.1%	133.8%

Source: SCAG 2021 Local Profiles Dataset Dataquick (CoreLogic)

<sup>2</sup> Data included in the SCAG 2021 Local Profile Dataset for Commerce.

Table 2-18 shows housing units for sale in September 2022 for Commerce and surrounding communities. The following is a summary of the findings in the table:

*Townhomes/Condos:*

- While no townhomes or condos were listed in Commerce, the median price in nearby cities ranged from \$554,950 to \$638,888 for a two-bedroom unit and \$545,000 to \$672,388 for a three-bedroom unit. Four bedroom units were over \$700,000.

*Single-Family Homes:*

- In Commerce, a one-bedroom house was listed for \$490,000. Two three-bedroom units were listed with a median price of \$674,444.
- The most common home size for sale was three-bedroom units. Three-bedroom homes comprised 60 percent of the 138 total home listings.
- The City of Maywood had the lowest median home listings, with a two-bedroom at \$535,000 and the median listing price of \$654,950 for three-bedroom units.
- The City of Downey had the highest median home listings, ranging from \$655,000 for two-bedroom homes up to \$2,690,000 for a six-bedroom home.

**Table 2-18: Homes for Sale in Commerce and Surrounding Communities –  
September 2022**

<b>Unit Type</b>	<b>Number of Bedrooms (Number of Units Listed)</b>	<b>Range</b>	<b>Median</b>	<b>Average</b>
<b>Condo/Townhome</b>				
Downey	2 bedroom (4)	\$475,000-\$580,000	\$554,950	\$541,225
	3 bedroom (2)	\$649,775 - \$695,000	\$672,388	\$672,388
	4 bedroom (1)	\$725,000	---	---
Montebello	1 bedroom (1)	\$371,000	---	---
	2 bedroom (2)	\$570,000 - \$674,900	\$622,450	\$622,450
	3 bedroom (3)	\$498,000 - \$688,000	\$545,000	\$577,000
Pico Rivera	2 bedroom (1)	\$638,888	---	---
	4 bedroom (1)	\$749,900	---	---
<b>Single-Family Home</b>				
Bell	2 bedroom (4)	\$489,000 - \$650,000	\$564,450	\$566,975
	4 bedroom (3)	\$650,000 - \$735,000	\$650,000	\$678,333
<b>Commerce</b>	<b>1 bedroom (1)</b>	<b>\$490,000</b>	<b>---</b>	<b>---</b>
	<b>3 bedroom (2)</b>	<b>\$649,888 - \$699,000</b>	<b>\$674,444</b>	<b>\$674,444</b>
Downey	2 bedroom (4)	\$580,000 - \$799,999	\$655,000	\$62,500
	3 bedroom (33)	\$650,000 - \$1,899,880	\$820,000	\$889,354
	4 bedroom (15)	\$730,000 - \$2,497,000	\$1,075,000	\$1,114,786
	5 bedroom (2)	\$1,450,000 - \$2,199,950	\$1,824,975	\$1,824,975
	6 bedroom (1)	\$2,690,000	---	---
Maywood	2 bedroom (1)	\$535,000	---	---
	3 bedroom (2)	\$599,900 - \$710,000	\$654,950	\$654,950
Montebello	2 bedroom (1)	\$615,000	---	---
	3 bedroom (26)	\$639,000 - \$890,000	\$705,000	\$735,038
	4 bedroom (6)	\$798,000 - \$1,080,000	\$914,500	\$909,167
	5 bedroom (6)	\$799,000 - \$1,150,000	\$933,975	\$997,808
Pico Rivera	2 bedroom (5)	\$614,900 - \$689,000	\$638,000	\$646,980
	3 bedroom (20)	\$599,000 - \$815,000	\$711,950	\$710,989
	4 bedroom (5)	\$679,000 - \$989,900	\$750,000	\$781,580
	6 bedroom (1)	\$999,999	---	---

Source: Zillow ([www.zillow.com](http://www.zillow.com)), accessed September 2022

## Rental Prices

Rents have also increased across Los Angeles County in recent years. The U.S. Census provides information on median contract rents. Table 2-19 shows these rents for Commerce and the surrounding cities in 2010 and 2020. The contract median rents in Commerce increased from \$832 in 2010 to \$1,039 in 2020, representing an increase of about 25 percent. Many neighboring communities had similar increases although Montebello and Downey experienced increases of more than 36 percent. Rents in Los Angeles County as a whole also increased to a greater extent than in Commerce, with median rents increasing by 39 percent between 2010 and 2020.

**Table 2-19: Median Contract Rents in Commerce and Surrounding Communities**

	2010	2020	Percent change 2010-2020
Bell	\$901	\$1,122	24.5%
<b>Commerce</b>	<b>\$832</b>	<b>\$1,039</b>	<b>24.9%</b>
Downey	\$1,063	\$1,450	36.4%
Maywood	\$864	\$1,072	24.1%
Montebello	\$989	\$1,349	36.4%
Pico Rivera	\$1,046	\$1,310	25.2%
Los Angeles County	\$1,017	\$1,415	39.1%

*Source: 2006-2010 and 2016-2020 ACS, Table B25058*

Because the ACS data may not fully reflect current rent trends, an online rent survey was conducted in September 2022 (Table 2-20). It should be noted that at the time of the online survey, no rental units were listed for the cities of Commerce, Bell or Maywood. Although the survey represents a snapshot of the rental market at a point in time, the fact that no rental units were available in Commerce may be an indicator of high demand and the need for more rental options in the City.

### *Apartments:*

- Of the 75 apartment listings, 28 were for one-bedroom units, 27 for two-bedroom units, ten for studios and eight for three-bedroom units.
- Studios ranged from \$1,250 to \$1,933 per month; one-bedroom units ranged from \$1,495 to \$2,808 per month, two-bedroom units ranged from \$1,700 to \$3,039 per month, and three-bedroom units ranged from \$3,399 to \$3,795 per month.
- The only three-bedroom units were listed in the City of Downey.

*Condos/Townhomes:*

- The only one-bedroom unit found in the online survey was in the City of Montebello with a monthly rent of \$1,900 per month.
- Two-bedroom units ranged from \$2,450 to \$2,900 while three-bedroom units ranged from \$2,850 to \$3,950.

*Single-Family Homes:*

- Montebello had the largest number of single-family homes for rent, including two four-bedroom homes.
- A total of 17 single-family homes were listed for rent. Nine of these (53 percent) were three-bedroom units and the median rents ranged from \$3,497 to \$4,125.



**Table 2-20: Rent Survey – September 2022**

Unit Type	Number of Bedrooms (Number of Units Listed)	Range	Median	Average
<b>Apartments</b>				
Downey	Studio (1)	\$1,850	---	---
	1 bedroom (12)	\$1,495 - \$2,808	\$1,898	\$1,999
	2 bedroom (25)	\$1,700 - \$3,039	\$2,500	\$2,568
	3 bedroom (8)	\$3,399 - \$3,795	\$3,708	\$3,659
Montebello	1 bedroom (9)	\$1,895 - \$2,200	\$1,979	\$2,039
	2 bedroom (3)	\$2,100 - \$2,500	\$2,349	\$2,316
Pico Rivera	Studio (9)	\$1,250 - \$1,933	\$1,795	\$1,695
	1 bedroom (7)	\$1,810 - \$2,447	\$2,219	\$2,193
	2 bedroom (1)	\$2,595	---	---
<b>Condo/Townhome</b>				
Downey	2 bedroom (2)	\$2,650 - \$2,900	\$2,775	\$2,775
	3 bedroom (2)	\$3,450 - \$3,950	\$3,700	\$3,700
Montebello	1 bedroom (1)	\$1,900	---	---
	2 bedroom (1)	\$2,700	---	---
	3 bedroom (1)	\$2,850	---	---
	5 bedroom (1)	\$4,300	---	---
Pico Rivera	2 bedroom (1)	\$2,450	---	---
	3 bedroom (2)	\$3,300 - \$3,500	\$3,400	\$3,400
<b>Single-family Home</b>				
Downey	2 bedroom (4)	\$2,000 - \$3,600	\$2,725	\$2,762
	3 bedroom (2)	\$3,750 - \$4,500	\$4,125	\$4,125
Montebello	3 bedroom (6)	\$3,000 - \$3,975	\$3,497	\$3,503
	4 bedroom (2)	\$3,450	---	---
Pico Rivera	2 bedroom (1)	\$2,700	---	---
	3 bedroom (1)	\$3,495	---	---
	5 bedroom (1)	\$3,800	---	---

*Note: at the time of the online survey, no rental units were listed within the Cities of Commerce, Bell or Maywood.*

*Sources: Rent.com and Apartments.com, accessed September 2022.*

### **Housing Affordability by Household Income**

Housing affordability is dependent upon income and housing costs. Using set income guidelines, current housing affordability can be estimated. According to the HCD income guidelines for 2022, the median income in Los Angeles is \$91,100. (adjusted for household size). Assuming that the potential homebuyer has sufficient credit and down payment (10 percent) and spends no greater than 30 percent of their income on housing expenses (i.e., mortgage, taxes, utilities, and insurance), the maximum affordable home price and rental price can be determined. The maximum affordable home and rental prices for residents in Los Angeles County are shown in Table 2-21 below.

**Table 2-21: Housing Affordability Matrix Los Angeles County (2022)**

Household	Annual Income <sup>1</sup>	Affordable Costs (All Costs)	Est. Utilities/Taxes/Insurance <sup>2</sup>		Affordable Rent	Affordable Home Price
			Utilities	Taxes, Ins., HOA (Ownership)		
<b>Extremely Low Income (0-30% AMI)</b>						
1-Person	\$25,050	\$626	\$201	\$420	\$425	\$54,306
2-Person	\$28,600	\$715	\$233	\$483	\$482	\$61,076
3-Person	\$32,200	\$805	\$269	\$551	\$536	\$67,006
4-Person	\$35,750	\$894	\$316	\$629	\$578	\$69,823
5-Person	\$38,650	\$966	\$374	\$712	\$592	\$66,957
<b>Very Low Income (30-50% AMI)</b>						
1-Person	\$41,700	\$1,043	\$201	\$566	\$842	\$125,612
2-Person	\$47,650	\$1,191	\$233	\$650	\$958	\$142,660
3-Person	\$53,600	\$1,340	\$269	\$738	\$1,071	\$158,653
4-Person	\$59,550	\$1,489	\$316	\$837	\$1,173	\$171,748
5-Person	\$64,350	\$1,609	\$374	\$937	\$1,235	\$177,019
<b>Low Income (50-80% AMI)</b>						
1-Person	\$66,750	\$1,669	\$201	\$785	\$1,468	\$232,890
2-Person	\$76,250	\$1,906	\$233	\$900	\$1,673	\$265,141
3-Person	\$85,800	\$2,145	\$269	\$1,020	\$1,876	\$296,553
4-Person	\$95,300	\$2,383	\$316	\$1,150	\$2,067	\$324,851
5-Person	\$102,950	\$2,574	\$374	\$1,275	\$2,200	\$342,327
<b>Median Income (80-100% AMI)</b>						
1-Person	\$63,750	\$1,594	\$201	\$759	\$1,393	\$220,043
2-Person	\$72,900	\$1,823	\$233	\$871	\$1,590	\$250,795
3-Person	\$82,000	\$2,050	\$269	\$987	\$1,781	\$280,279
4-Person	\$91,100	\$2,278	\$316	\$1,113	\$1,962	\$306,864
5-Person	\$98,400	\$2,460	\$374	\$1,235	\$2,086	\$322,841
<b>Moderate Income (100-120% AMI)</b>						
1-Person	\$76,500	\$1,913	\$201	\$870	\$1,712	\$274,646
2-Person	\$87,450	\$2,186	\$233	\$998	\$1,953	\$313,106
3-Person	\$98,350	\$2,459	\$269	\$1,130	\$2,190	\$350,299
4-Person	\$109,300	\$2,733	\$316	\$1,272	\$2,417	\$384,807
5-Person	\$118,050	\$2,951	\$374	\$1,407	\$2,577	\$406,994

**Assumptions:**

1. 2022 HCD income limits;
2. 30% of household income spent on housing; LACDA utility allowance; 35% of monthly affordable cost for taxes and insurance; 10% down payment; and 3% interest rate for a 30-year fixed-rate mortgage loan. Taxes and insurance apply to owner costs only; renters do not usually pay taxes or insurance.

Sources: California Department of Housing and Community Development (HCD) 2022 Income Limits; Los Angeles County Development Authority (LACDA), 2022 Utility Allowance Schedule; Veronica Tam & Associates, 2022.

Comparing the information from Table 2-21 with the rental and purchase prices described earlier in this section, the following assumptions can be made about affordability in Commerce:

- **Home Purchases:** With a median home value of \$532,000 in Commerce (Table 2-17), purchasing a home is unaffordable for all low and moderate income households. The median listing prices in Table 2-18 are also unaffordable to lower and moderate income households.
- **Apartment Rentals:** Since no rental properties were found in Commerce during the online survey, rents in the neighboring cities of Downey, Montebello and Pico Rivera were looked at for affordability options. The median rents for studios (\$1,795 to \$1,979) and one-bedroom units (\$1,898 to \$2,219) are only affordable to moderate income households if they find units on the lower end of the rental range. The same is the case for two-bedroom units (median rents of \$2,349 to \$2,595). The median rent for three-bedroom units (\$3,708) are unaffordable for all lower and moderate income households.
- **Single-Family Home Rentals:** Since no rental properties were found in Commerce during the online survey, rents in the neighboring cities of Downey, Montebello and Pico Rivera were looked at for affordability options. The median rents for house rentals are unaffordable to all lower and moderate income households.

### **Ability to Pay for Housing/Cost Burden**

According to HUD, affordable housing costs should equal 30 percent or less of a household's income. Because household incomes and sizes vary, the affordable price for each household also varies. For example, a double income household with no children could afford a different level of housing cost than a large family with one lower income wage earner.

Per federal criteria, households are considered to be overpaying, or cost burdened, when they pay more than 30 percent of their income for housing. Severe cost burden is when households spend 50 percent or more on housing. In 2020, approximately 39 percent of households in Commerce experienced cost burden (Table 2-22). This percentage is similar to Los Angeles County overall. Severe cost burden impacted 16 percent of Commerce households, a slightly lower percentage than households countywide. Renter households in Commerce experienced cost burden and severe cost burden at a greater rate than owner households. Over 47 percent of renter households were cost burdened compared to 33 percent of owner households. About 23 percent of renter households experienced severe cost burden compared to 13 percent of owner households.

**Table 2-22: Cost Burden Severity**

	Owner-Occupied		Renter-Occupied		All Households		Los Angeles County
	Units	Percent	Units	Percent	Units	Percent	Percent
Cost Burden (>30%)	637	33.0%	740	47.1%	1,377	39.3%	40.1%
Severe Cost Burden (>50%)	241	12.5%	355	22.6%	576	16.4%	20.1%
Total Households	1,933		1,570		3,503		

Source: 2016-2020 ACS, Tables B25070 and B25091

The income level of households also greatly impacts the ability to pay for housing. Table 2-23 shows that lower income households experience much greater levels of cost burden than other households. This is particularly the case for extremely low income households who earn less than 30 percent of the AMI. Approximately 33 percent of owner-occupied households facing cost burden are extremely low income households while 34 percent are very low income households. For households facing severe cost burden, 47 percent are extremely low and 45 percent are very low households. Renter households experiencing cost burden and severe cost burden are also primarily extremely low and very low households.

**Table 2-23: Income by Cost Burden**

	<b>Cost Burden &gt; 30%</b>	<b>Percent</b>	<b>Cost Burden &gt; 50%</b>	<b>Percent</b>
<b>Owners</b>				
Household Income <= 30% AMI	195	33.1%	120	47.1%
Household Income >30% to <=50% AMI	200	33.9%	115	45.1%
Household Income >50% to <=80% AMI	120	20.3%	20	7.8%
Household Income >80% to <=100% AMI	50	8.5%	0	0.0%
Household Income >100% AMI	25	4.2%	0	0.0%
<b>Total</b>	<b>590</b>	<b>100.0%</b>	<b>255</b>	<b>100%</b>
<b>Renters</b>				
Household Income <= 30% AMI	435	50.6%	295	79.7%
Household Income >30% to <=50% AMI	325	37.8%	55	14.9%
Household Income >50% to <=80% AMI	100	11.6%	20	5.4%
Household Income >80% to <=100% AMI	0	0.0%	0	0.0%
Household Income >100% AMI	0	0.0%	0	0.0%
<b>Total</b>	<b>860</b>	<b>100%</b>	<b>370</b>	<b>100%</b>

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2015-2019; Data released September 9, 2022

## Special Needs Housing

Certain groups have greater difficulty finding decent, affordable housing due to special needs and/or circumstances. Special circumstances may be related to one's employment and income, family characteristics, disability, and household characteristics, among other factors. "Special needs" groups include: seniors, persons with disabilities (including persons with developmental disabilities), homeless, single-parent households, large households, migrant/farmworkers and extremely low income households (Table 2-24). This section provides a detailed discussion of the housing needs facing each particular group, as well as programs and services available to address their housing needs.

**Table 2-24: Special Needs Populations - 2020**

Special Needs Group	Number of Persons	Number of Households	Percent <sup>1</sup>
Seniors	2,285	----	17.9%
with a Disability	681	----	5.3%
HH with One or More Seniors	----	647	18.5%
Seniors Living Alone	320	----	2.5%
Persons with Disabilities	1,701	----	13.4%
Female-Headed Households	----	935	26.7%
with Own Children	----	279	8.0%
Living Below the Poverty Line	----	117	3.3%
Male-Headed Households	----	399	11.4%
with Own Children	----	130	3.7%
Living Below the Poverty Line	----	29	0.8%
Large Households	----	899	25.7%
Renter	----	279	8.0%
Owner	----	620	17.7%
Households Below the Poverty Line	----	537	15.3%
Agricultural Workers <sup>2</sup>	58	----	0.5%
Persons Experiencing Homelessness <sup>3</sup>	83	----	0.7%
Total Population/Households	12,738	3,503	

1. Some data is available at the individual (person) level and some is available at the household level. The percent column represents either as a proportion of total population or total households.
2. Agricultural Workers includes agriculture, forestry, fishing and hunting.
3. The 83 persons experiencing homelessness counted in 2022 were unsheltered, according to LSHSA.

Sources: 2016-2020 ACS and Los Angeles Homeless Services Authority 2022 PIT Homeless count.

## Seniors

As described in Table 2-2 at the beginning of this chapter, the percentage of elderly (65 years and older) residents in Commerce almost doubled from 9.2 percent in 2010 to 17.9 percent in 2020. Additionally, the median age in Commerce increased by almost ten years during the last decade. Escalating housing costs, particularly in the rental market, severely impact housing affordability for the elderly. The special needs of many elderly households result from their lower, fixed incomes, physical disabilities, and dependence needs. When looking at the senior population (2,285 persons), approximately 30 percent of seniors have a disability and 14 percent of seniors are living alone. ~~A review of the Department of Social Services found that there are no assisted living facilities in Commerce.~~

~~The City of Commerce's Senior Center offers a variety of programs for Commerce residents age 50 and older. Activities include exercise classes, arts and crafts, cooking, drawing, painting, dancing, card games, Chi Gong, events with live entertainment and tournaments. Also, the center offers seniors excursions to some of the great locations of interest in Southern California. The Center also offers a daily lunch nutrition program, transportation to and from the center and a ride assistance program to help with errands. The City's Social Services Division also coordinates The Emergency Food Assistance Program (TEFAP) through the Los Angeles Regional Food Bank (LARF). TEFAP Pantry distribution is available every 3rd Thursday of the month to pre-registered individuals living at senior living apartment complexes (i.e. Telacu, Telacu Gardens, Rosewood Park Senior Apartments, and Commerce Senior Apartments).~~

### Resources for Seniors

A review of the Department of Social Services found that there are no assisted living facilities in Commerce. However, four apartment complexes in the City are age-restricted: Telacu, Telacu Gardens, Rosewood Park Senior Apartments, and Commerce Senior Apartments. All of these complexes are income-restricted.

The City of Commerce's Senior Center offers a variety of programs for Commerce residents age 50 and older. Activities include exercise classes, arts and crafts, cooking, drawing, painting, dancing, card games, Chi Gong, events with live entertainment and tournaments. Also, the center offers seniors excursions to some of the great locations of interest in Southern California. The Center also offers a daily lunch nutrition program, transportation to and from the center and a ride assistance program to help with errands. The City's Social Services Division also coordinates The Emergency Food Assistance Program (TEFAP) through the Los Angeles Regional Food Bank (LARF). TEFAP Pantry distribution is available every 3rd Thursday of the month to pre-registered individuals living at senior living apartment complexes (i.e. Telacu, Telacu Gardens, Rosewood Park Senior Apartments, and Commerce Senior Apartments). The City's Senior Citizens Commission meets the first Wednesday of each month to formulate policies and



recommendations for submission to the City Council with respect to senior programs available to residents.

Low-income senior residents age 57 and older with at least three years of residency in the city can apply for a \$300 monthly rent subsidy which is paid to their landlord.

## People Living with Disabilities

The special housing needs of disabled persons include accessible housing units, close proximity to public services and commercial centers, and special design features that alleviate the disability. State and federal laws require that a portion of all rental apartments containing five or more units are made accessible to disabled persons. The City applies standard conditions of approval to residential development projects that reflect that mandate. The cost for retrofitting an existing structure may be thousands of dollars and be beyond the reach of those households with lower incomes.

Some people with disabilities can live most successfully in housing that provides a semi-independent living state, such as clustered group housing or other group-living quarters; others are capable of living independently if long-term services and support are available.

In 2020, 13 percent of Commerce's population had a disability.

Table 2-25 indicates the rate at which different disabilities are present among residents in the City.<sup>3</sup> The most prominent disability was ambulatory difficulties (7.2 percent), followed by independent living difficulties (6.9 percent) and cognitive difficulties (6.5 percent).

**Table 2-25: Disability By Type**

Disability Type	Number	Percent
Hearing Difficulty	277	2.2%
Vision Difficulty	371	2.9%
Cognitive Difficulty	788	6.5%
Ambulatory Difficulty	878	7.2%
Self-Care Difficulty	482	4.0%
Independent Living Difficulty	692	6.9%
Total with a Disability	1,701	13.4%

Source: 2016-2020 ACS, Table S1810

<sup>3</sup> These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed.

## People Living with Developmental Disabilities

Senate Bill 812, which took effect January 2011, requires housing elements to include an analysis of the special housing needs of the developmentally disabled in accordance with Government Code Section 65583(e). Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down's Syndrome, autism, epilepsy, cerebral palsy, and mild to severely impaired intellectual and adaptive functioning. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and/or live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them.

The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities. The State has 21 regional centers that provides point of entry to services for people with developmental disabilities. Based on zip codes, services for Commerce residents are as follows:

- Eastern Los Angeles Regional Center, located in Alhambra: zip codes 90040, 90022, and 90023
- Frank D. Lanterman Regional Center, located in Los Angeles: zip code 90040
- South Central Los Angeles Regional Center, located in Los Angeles: zip code 90040

The following information from the State Department of Developmental Services (DDS) provides a closer look at the disabled population. Data shown in

Table 2-26 estimates the number of individuals with developmental disabilities by zip code. It should be noted that zip code 90022 covers areas outside of the City of Commerce. Most persons experiencing a developmental disability reside in the home of a parent, family, or guardian. Independent living and supportive housing opportunities are needed for those who may be aging out of their current living situations or losing family support.

**Table 2-26: Consumer Count by California  
ZIP Code and Age Group**

Zip Code	0-17 yrs	18+ yrs	Total
90022*	524	368	892
90023	409	249	658
90040	116	54	170

\*Note: Zip Code 90022 also includes East Los Angeles

Source: California Department of Developmental Services, January 2022 Report

The needs of individuals with developmental disabilities are similar to those with other disabilities, and they face similar challenges in finding affordable housing. Many individuals with developmental disabilities are on fixed incomes and cannot afford market rate rents. In addition, supportive services are often beneficial to maintain housing stability. Persons with developmental disabilities can access services through the Regional Centers. Supportive services available to seniors can also benefit many persons with disabilities. Furthermore, the City is actively pursuing affordable housing opportunities in the community. Housing Choice Vouchers (HCV) through the Housing Authority of the County of Los Angeles (HACLA) is the primary rental assistance available to lower income households, including those with disabilities.

### **Resources for Disabled Residents**

The City's Commission on Disabilities Access and Opportunity is a five-person commission that advises the City Council regarding concerns or issues affecting people with special needs, including those with physical and mental disabilities. The Commission meets once a month.

211 LA is a clearinghouse of information for services available to County residents. Many organizations that assist disabled and developmentally disabled residents are provide information on this network. Services listed include independent living skills instruction, social learning, developmental disabilities social and recreational programs and in-home health services among others. The three regional centers discussed above also have resources available to assist residents with disabilities.

Southern California Resource Services for Independent Living provides a non-residential center for people with disabilities, including those who live in Commerce.

### **Large Households**

Large households are defined by the U.S. Census Bureau as households containing five or more persons. As shown in Table 2-24, the 2020 ACS data shows that a quarter of

Commerce households are large households. Of these 899 households, 620 (69 percent) are owner-occupied and 279 (31 percent) are renter-occupied.

### *Housing Units Available for Large Households*

The unit sizes available in a community affect the household sizes that can access that community. Large households are generally served by housing units with three or more bedrooms. The 2020 ACS data reflected that 1,479 occupied housing units had three or more bedrooms, accounting for 42 percent of the City's housing stock. Of these larger units, 1,167 were owner-occupied and 312 were renter-occupied.

Although enough units appear to be available to meet the demand for large households (i.e., there are 899 large family households and 1,479 units with three or more bedrooms), available large units may be unaffordable to large households (see ability to pay for housing section of this chapter). Due to the limited supply of adequately sized rental units and affordable homeownership opportunities, large households face additional difficulty in locating housing that is adequately sized and affordably priced.

Affordable homeownership and rental assistance are resources to help large households, especially those with lower incomes. The City is actively pursuing affordable homeownership for its workforce through development agreements. The City will be pursuing other affordable housing opportunities using City-owned properties. ~~The HCV program is the primary rental assistance available to lower income households.~~

### **Resources for Large Households**

~~The HCV program is the primary rental assistance available to lower income households, including large households. Also, programs that facilitate affordable housing development and diversity of housing types in general will benefit large households.~~

### **Single-Parent Households**

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income.

As shown in Table 2-24, there are a total of 3,503 households in Commerce, of which 576 (16 percent) are female-headed households. Of these 576 households, 279 have children under the age of 18. In 2020, there were 399 male-headed households (11 percent of total households) with 130 of these including children under the age of 18. Female-headed households are the household type that face the greatest economic challenges in Commerce. In 2020, while female headed-households in poverty comprised three percent

of all Commerce households, they represented over 60 percent of the 537 Commerce households living below the poverty line.<sup>4</sup>

### **Resources for Single-Parent Households**

HCV and other programs such as Family Self-Sufficiency are resources for single-parent households. Specifically, female-headed households typically qualify for preferences for services. Female-headed households comprise a significant portion of HCV recipients.

The City's Parks and Recreation Department offers a variety of youth programs at its four community parks and associated community centers. These include preschool programs as well as children programs and youth sports. The Brenda Villa Aquatic Center has swimming facilities for youth.

The City's Teen Center offers a variety of programs and support for teens living in Commerce. Programs include exercise, arts and crafts, cooking, drawing, painting, performing arts, tournaments, dances and excursions. The Center includes internet access, pool tables, video games and other amenities.

Commerce has a Youth Advisory Commission that advises the City Council on all matters pertaining to youth in the city.

The LA County 211 LA database includes information about food benefit programs for families such as CalFresh and the Women, Infants and Children (WIC) food program. Summer food programs listed for school age children are also included.

### **Agricultural Workers**

The special housing needs of many farm workers stem from their low wages and the seasonal nature of their employment. Most of Commerce residents work in the Los Angeles-Long Beach Metropolitan area in non-agricultural occupations. As shown in Table 2-24, 58 farm workers and other persons in forestry and fishing occupations were identified in the City in 2020. These workers account for one percent of the City's total workforce population. These persons are likely to be employed in nurseries and landscaping services, stables, and not in traditional agricultural production. According to the USDA 2017 Census on agricultural population, there were 413 farms in Los Angeles County and 3,266 farmworkers. Of these farmworkers about a third (1,044) worked for 150 days or more annually.<sup>5</sup> Only 22 farms in Los Angeles County hired migrant farmworkers. An estimated 395 migrant workers worked in the County. Given that

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<sup>4</sup> See footnote 4

<sup>5</sup> USDA, 2017 Census of Agriculture – County Data: Table 7. [www.nass.usda.gov](http://www.nass.usda.gov).

Commerce has no farming activities and no land is zoned for agricultural uses, it is not likely there are any migrant farmworkers in the City. The demand for housing generated by farm workers in the City is thus estimated to be extremely low.

### **Resources for Agricultural Workers**

The LA County 211 LA database including resources for agricultural workers in the County. This includes food benefit programs including CalFresh, which is eligible to households with a migrant or seasonal farmworker.

### **Households Living Below the Poverty Level**

~~According to the 2020 ACS, approximately 11 percent of Commerce residents live below the poverty line. Table 2-24 above show the percentage of Commerce households that live below the poverty line. Approximately 15 percent of the City's households live in poverty. As described above, over 60 percent of the 537 Commerce households living below the poverty line are female-headed households. The HCV program is the primary rental assistance available to lower income households, especially those with extremely low income households. HUD policy requires allocating 70 percent of new vouchers to households with extremely low incomes, which include households living below the poverty level.~~

### **Resources for Households Living Below the Poverty Level**

The HCV program is the primary rental assistance available to lower income households, especially those with extremely low income households. HUD policy requires allocating 70 percent of new vouchers to households with extremely low incomes, which include households living below the poverty level.

During the Thanksgiving and Christmas Holidays, the City of Commerce receives food and in-kind donations from local businesses and civic organizations. With the help of community volunteers, the food is packaged and distributed to the low income residents and families who apply and qualify under the required income guidelines.

211LA provides a variety of resource connections for low-income residents in the County. These include the Food Finder tool to locate food benefits and services, meals and food pantries throughout the County.

The Housing Rights Center offers housing services and legal services throughout LA County.

### **Extremely Low Income (ELI) Households**

Extremely low income households are households earning 30 percent or less than the area median income (AMI). Extremely low income households are more likely to

experience housing problems and cost burden. Table 2-27 shows the latest Comprehensive Housing Affordability Strategy (CHAS) data based on the 2015-2019 ACS. Approximately 24 percent of households in Commerce are extremely low income. Of these 850 households, approximately 69 percent are renters and 31 percent are owners. The table also shows that three-quarters of extremely low households in Commerce experience cost burden. Due to increases in rent and housing prices, these households will likely continue to face housing problems. ~~The particular needs of extremely low income households are taken into consideration and are generally addressed through the City’s overall programs for housing affordability and by prioritizing funding and development opportunities for projects that include housing for ELI households. The HCV program is the primary rental assistance available to extremely low income households. HUD policy requires allocating 70 percent of new vouchers to households with extremely low incomes.~~

**Resources for Extremely Low Income Households**

The particular needs of extremely low income households are taken into consideration and are generally addressed through the City’s overall programs for housing affordability and by prioritizing funding and development opportunities for projects that include housing for ELI households. The HCV program is the primary rental assistance available to extremely low income households. HUD policy requires allocating 70 percent of new vouchers to households with extremely low incomes.

Please also see Resources for Households Living Below the Poverty Level.

**Table 2-27: Extremely Low Income (ELI) Households by Tenure and Housing Problems**

	Owner		Renter		Total	
	Households	Percent	Households	Percent	Households	Percent
ELI Households	265	16.0%	585	31.2%	850	24.0%
With Housing Problem	195	73.6%*	435	74.4%*	630	74.1%*
With Cost Burden	195	73.6%*	435	74.4%*	630	74.1%*
Total Households in Commerce	1,660	100%	1,875	100%	3,535	100%

*\*Note: Percentage is of ELI Households only*

*Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2015-2019; Data released September 9, 2022*

**Individuals and Families Experiencing Homelessness**

Individuals and families experiencing homelessness have immediate housing needs. Homelessness in Commerce, as in other communities, results from a combination of factors, including loss of employment, inability to find a job due to lack of skills, and high



housing costs in comparison to incomes. For some, homelessness may also be the result of chronic health problems, physical disabilities, mental health disabilities, or substance abuse. While the specific nature of the factors causing homelessness may vary, there are typically three root causes:

- Lack of affordable housing;
- Lack of access to affordable support services; and
- Low household incomes.

The Los Angeles Homeless Services Authority (LAHSA) released [data for 2022 in their latest data in](#) September 2022. The annual Point-in-Time (PIT) Count of people experiencing homelessness was conducted throughout Los Angeles County over several nights in February 2022. The County is divided into Service Planning Areas (SPAs) and Commerce is located in SPA 7. [While the LAHSA has released data from the 2023 PIT Count, at the time of this report writing, the information is only at the County and SPA levels and does not include information at the City level. Therefore, the 2022 information was used instead to provide a consistent picture for LA County and the City of Commerce.](#)

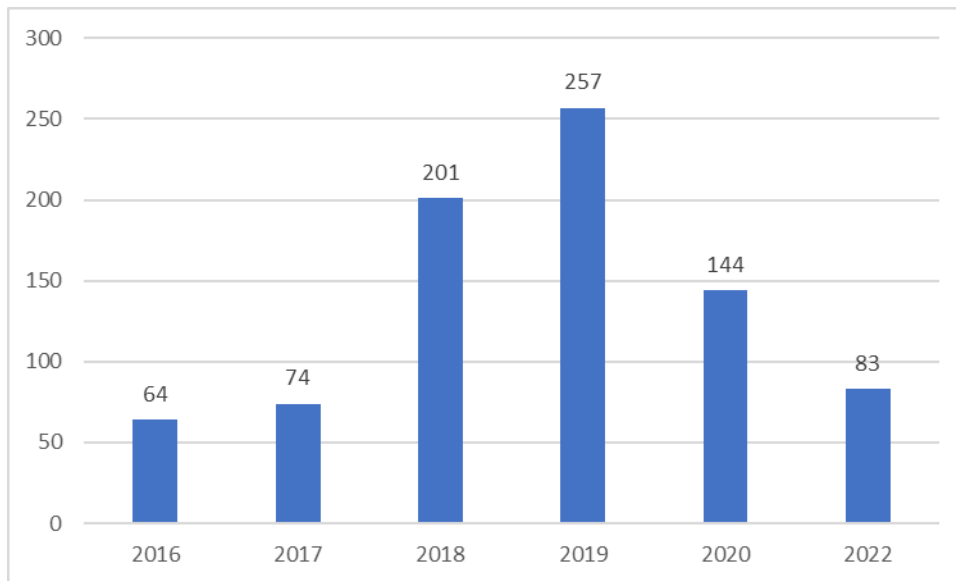
Figure 2-5: Unsheltered Persons in Commerce (2016-2020, 2022)\* and

Table 2-28 show the results from the PIT Count.<sup>6</sup> A total of 83 unsheltered persons were counted in Commerce. This number is lower than in the past few years, with 257 persons being the highest number of unsheltered persons counted in Commerce in 2019 (Figure 2-5). Of the unsheltered persons in 2022, over half (55 percent) were in some type of vehicle, such as cars, vans or RVs. Persons in makeshift shelters comprised 30 percent of those counted.

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<sup>6</sup> A Point in Time Count was not conducted in 2021 due to the COVID-19 pandemic.

**Figure 2-5: Unsheltered Persons in Commerce (2016-2020, 2022)\***



\*Due to the COVID-19 pandemic, a Point-in-Time Count was not conducted in 2021.

Source: Los Angeles Homeless Services Authority Dashboard, [www.lahsa.org](http://www.lahsa.org)

**Table 2-28: Unsheltered Persons in Commerce - 2022**

	Number	Percent
Cars	10	12.0%
Vans	5	6.0%
RVs	32	38.6%
Tents	4	4.8%
Makeshift Shelters	25	30.1%
On the Street	7	8.4%
Total	83	100.0%

Source: Los Angeles Homeless Services Authority, 2022 Greater Los Angeles Homeless County, Data released September 8, 2022.

Since Commerce is an industrial City, it is easier for vehicles to park in undisclosed places. City staff stated that the majority of the homeless stay within the City’s industrial areas. They typically congregate in rail spurs, freeway underpasses, embankments and vacant lots throughout the City.

**Resources for Individuals and Families Experiencing Homelessness**

Although no homeless shelters are located in Commerce, various facilities located in the surrounding communities are available to provide shelter for homeless individuals and families. These facilities are categorized and described in Table 2-29. In Commerce, the

~~Homeless, Engagement And Referral Team consisting of Social Services, Sheriff's Department, Public Safety, and Homeless Agency staff provides outreach, information, resources and referrals to homeless individuals in encampments, cars and RV's.~~

**Table 2-29: Inventory of Homeless Services and Facilities in the Region**

Organization	Services Provided
Salvation Army Bell Shelter 5600 Rickenbacker Rd. #2d Bell, CA 90201 (323) 262-1804	Temporary emergency housing and support services for individuals. Services include; general program referral and counseling, emergency shelter vouchers, transportation assistance, mental health services, food and clothing distribution, and rental and utility payment assistance.
Long Beach Rescue Mission 1335 Pacific Avenue Long Beach, CA 90801 (562) 591-1292	Emergency shelter and a 12-month substance abuse program for men and women. Up to 120 beds are provided. The length of stay varies. Provides food services to the public. Provides services for women and children.
Salvation Army 809 E. 5 <sup>th</sup> St. Los Angeles, CA 90013 (213) 626-4786	Provides 286 beds for men and women for up to a stay of one year. Provides food services to the public.
Catholic Charities - Family Shelter 123 East 14th. Long Beach, CA 90813 (562) 591-1351	Provides transitional housing for homeless men, women and children. Single residents must be elderly or disabled. Stays of up to 45 days are permitted.
Mental Health Association of Los Angeles County 100 W. Broadway, Suite 5010 Long Beach, CA 90802-2310	Temporary emergency housing and support services for individuals.
East Rancho Dominguez Community Services 4513 E. Compton, Boulevard Compton, CA 90221	Multi-purpose facility designed to enhance the community with educational, social and recreational activities. Staff and non-profit agencies provide comprehensive information and referrals, case management, utility assistance, outreach, and emergency food distribution..
Christian Outreach Appeal 515 E. Third Street Long Beach, CA 90802 (562) 436-9877	Provides programs and informational resources for homeless, seniors and single-mothers, housing opportunities and hot meals.
Catholic Charities - Family Shelter 123 East 14th. Long Beach, CA 90813 (562) 591-1351	Provides transitional housing for homeless men, women and children. Single residents must be elderly or disabled. Stays of up to 45 days are permitted.

Organization	Services Provided
Family Crisis Center Confidential Location Redondo Beach (310) 792-5900	Provides beds for up to 15 women with children under 18 who are victims of domestic violence. Shelter for adolescents at risk of becoming homeless is also provided. Services include referrals to homeless shelters and outpatient counseling. Stays of up to 6 months are permitted.
Los Angeles Mission 303 E 5 <sup>th</sup> Street Los Angeles, CA 90022 (213) 629-1227	Provides 35 beds for individuals, resources and food services to the public.
East Los Angeles Women's Center 1431 S. Atlantic Blvd. Los Angeles, CA 90022 (323) 526-5819	Provides Domestic Violence services, sexual assault services, shelter, HIV/AIDS services
Southern California Alcohol and Drug Programs, Inc. Los Angeles Area 11500 Paramount Boulevard Downey, CA 90241 (562) 923-4545	Certified Drug Medi-Cal provider offers Outpatient, residential treatment and recovery support services to Medi-Cal and My Health beneficiaries. Assistance with enrolling in Medi Cal and My Health Los Angeles is available. Other programs available: Angel Step Inn, La Casita, Positive Steps.
Comunidad Cesar Chavez 207 N. Breed Street Los Angeles, CA 90033 Open 24 hours	Bridge housing for 27 families in Boyle Heights.
Helpline Youth Counseling 1481 Telegraph Road Whittier, CA 90604 (562) 273-0722	Mental Health services, Family services, Community and Homeless services, Substance Abuse services, Counseling services.
People Assisting the Homeless 340 N. Madison Avenue Los Angeles, CA 90004 (323) 644-2200	Employment, Outreach, Homeless Prevention, Housing navigation.

Source: City of Commerce

In Commerce, the Homeless, Engagement And Referral Team (HEART) consists of Code Enforcement, Social Services, Public Works, Sheriff's Department and Public Safety employees. The HEART members go out on responses to calls regarding persons experiencing homelessness living in their vehicles or other locations in the City. The team provides information about nearby services and resources. The team will return a few days later to check in and see what else may be needed. If there is a violation of a local ordinance, the team will post a 72-hour notice.

A variety of social service agencies are available to assist persons experiencing homelessness. All of the information is available to residents through the City's service counter at the Recreation Department. One agency, Helpline Youth Counseling, has an office within the City limits. Headquartered in Whittier, this organization works with families and youth and provides counseling as well as homeless and housing support services. A 24/7 helpline is available along with walk-in hours during the week.

211 LA's Coordinated Entry System for Families (CESF) provides access to a network of homeless services providers throughout the County. In addition, 211 offers contact information for a variety of shelters and programs for individuals experiencing homelessness and those at risk of becoming homelessness.

### **Cumulative Needs and Resources for Special Needs Groups in Commerce**

Below is a summary of special needs groups in Commerce as well as available resources to assist them:

#### **Special Needs Groups**

- the percentage of elderly (65 years and older) residents in Commerce almost doubled from 9.2 percent in 2010 to 17.9 percent in 2020. Additionally, the median age in Commerce increased by almost ten years during the last decade.
- In 2020, 13 percent of Commerce's population had a disability. The most prominent disability was ambulatory difficulties (7.2 percent), followed by independent living difficulties (6.9 percent) and cognitive difficulties (6.5 percent).
- Most persons experiencing a developmental disability reside in the home of a parent, family, or guardian. Independent living and supportive housing opportunities are needed for those who may be aging out of their current living situations or losing family support.
- A quarter of Commerce households are large households. Of these 899 households, 620 (69 percent) are owner-occupied and 279 (31 percent) are renter-occupied.
- 16 percent of the City's households are female-headed households. Of these 576 households, 279 have children under the age of 18. In 2020, there were 399 male-headed households (11 percent of total households) with 130 of these including children under the age of 18.
- In 2020 58 farm workers and other persons in forestry and fishing occupations were identified in the City. These persons are likely to be employed in nurseries and landscaping services and not in traditional agricultural production. No land in Commerce is zoned for agricultural uses.
- Approximately 15 percent of Commerce residents live below the poverty line.

- According to the 2022 PIT Count, 83 unsheltered persons were counted in Commerce.

## **Support Projects and Resources**

### **Housing Developments**

- Four apartment complexes in the City are age-restricted: Telacu, Telacu Gardens, Rosewood Park Senior Apartments, and Commerce Senior Apartments. All of these complexes are income-restricted.

### **Local Resources and Facilities**

- The City of Commerce's Senior Center offers a variety of programs for Commerce residents age 50 and older.
- The Emergency Food Assistance Program (TEFAP) through the Los Angeles Regional Food Bank (LARF). TEFAP Pantry distribution is available every 3rd Thursday of the month to pre-registered individuals living at senior living apartment complexes.
- 211 LA is a clearinghouse of information for services available to County residents. Many organizations that assist disabled, developmentally disabled, senior and low-income residents provide information on this network.
- 211 LA's Coordinated Entry System for Families (CESF) provides access to a network of homeless services providers throughout the County.
- During the Thanksgiving and Christmas Holidays, the City of Commerce receives food and in-kind donations from local businesses and civic organizations.

### **Commerce Funding for Assistance and Programs**

- The First Time Homebuyer 2.0 Program has been used to provide income-qualified (up to 175 percent AMI) Commerce residents secondary financing of up to \$150,000 to assist with down payment and closing costs related to purchasing a new home within the Rosewood Village housing development,
- Low-income senior residents age 57 and older with at least three years of residency in the city can apply for a \$300 monthly rent subsidy which is paid to their landlord.
- The City's Parks and Recreation Department offers a variety of youth programs at its four community parks and associated community centers. The City's Teen Center offers a variety of programs and support for teens living in Commerce.
- In Commerce, the Homeless, Engagement And Referral Team consisting of Social Services, Sheriff's Department, Public Safety, and Homeless Agency staff provides outreach, information, resources and referrals to homeless individuals in encampments, cars and RV's.

**Participation in Federal, State, County and Non-Profit Programs**

- The HCV program is the primary rental assistance available to lower income households
- The Housing Rights Center offers housing services and legal services throughout LA County

**Housing Element Programs**

Several program in this Housing Element include provisions for special needs residents in Commerce. Please refer to Chapter 5, Housing Plan, for more information.

## Assisted Housing At-Risk of Conversion to Market Rate Housing

According to California Government Code Section 65583(a)(8) and (c)(6), jurisdictions must evaluate the potential for currently rent restricted low-income housing units to convert to non-low-income housing in ten years and propose programs to preserve or replace these units. For this Housing Element, this ten-year analysis period covers from October 15, 2021, through October 15, 2031. This section identifies the City's assisted units at-risk of conversion to market rate housing.

Seven developments in Commerce have received mortgage assistance through the federal government and/or the State of California.

There are currently three federally assisted multi-family rental complexes in Commerce with affordability covenants including: 55 units at the Rosewood Park Senior Apartments, 24 units at TELACU Gardens and 76 units at TELACU Manor. Table 2-29 The City has other affordable housing developments that are not governed by affordability covenants or deed restrictions such as the 10-unit Commerce Family Homes, 68-unit Commerce Senior Apartments, and four-unit Commerce Watcher Street Homes. These projects receive project-based rental assistance. Table 2-30 shows the details about these complexes, including the name, address, government assistance, affordability controls and other pertinent information for the government-assisted projects in the city. These developments have a total of 354 subsidized units.

**Table 2-30: Assisted Multifamily Rental Complexes in Commerce**

<u>Development Name</u>	<u>Address</u>	<u>Affordable Units</u>	<u>Type of Assistance</u>	<u>Covenant/Contract End</u>	<u>At-Risk</u>
<u>Rosewood Park Senior Apts.</u> <u>Total Units = 94 units</u>	<u>2230 Eastern Ave.</u>	<u>93</u>	<u>LIHTC</u>	<u>2053</u>	<u>No</u>
<u>Studio 6 LA Commerce</u> <u>Total Units = 81 units</u>	<u>7701 E. Slauson Ave</u>	<u>81</u>	<u>HCD</u>	<u>2075</u>	<u>No</u>
<u>TELACU Manor</u> <u>Total Units = 75 units</u>	<u>7100 E. Gage Ave</u>	<u>75</u>	<u>HUD</u>	<u>2035</u>	<u>No</u>
<u>TELACU Gardens</u> <u>Total Units = 24 units</u>	<u>7131 E. Gage Ave</u>	<u>23</u>	<u>HUD</u>	<u>2033</u>	<u>No</u>
<u>Commerce Family Homes</u> <u>Total Units = 10 units</u>	<u>6201 Emil Ave</u>	<u>10</u>	<u>HUD</u>	<u>2024</u>	<u>Yes</u>
<u>Commerce Senior Apartments</u> <u>Total Units = 68 units</u>	<u>6725 E. Gage Ave</u>	<u>68</u>	<u>HUD</u>	<u>2027</u>	<u>Yes</u>
<u>Commerce Watcher St Homes</u> <u>Total Units = 4 units</u>	<u>7010 Watcher St.</u>	<u>4</u>	<u>HUD</u>	<u>2024</u>	<u>Yes</u>
<u>Total</u>		<u>354</u>	<u>-</u>	<u>-</u>	



Source: City of Commerce, 2023

## **At Risk Status**

State law requires the housing element to include an assessment of the likelihood that the publicly assisted affordable projects will be at risk of conversion to non-low income uses. This determination of “at risk” status depends on: 1) whether the original deed restrictions that accompany public assistance are expiring; 2) the desire of the property owner to convert the project to market rates; and 3) current housing market conditions. At-risk projects are those considered to be at risk of conversion to market rate housing within 10 years following adoption of the housing element, or 2031. There are three assisted rental housing projects at risk of expiring during the 2021-2031 Housing Element period, with a total of 82 units. Government Code Section 65583 requires each city and county to conduct an analysis and identify programs for preserving assisted housing developments. The analysis is required to identify any low income units that are at risk of losing deed-restricted subsidies in the next 10 years. All three of the projects in the City with 153 affordable units are deemed at risk of conversion during the ten-year at-risk analysis period.

- Commerce Family Homes (10 affordable units) – Commerce Family Homes, owned by JT Kinsey, has 10 low income family housing units subsidized by HUD Section 8 Project-Based Rental Assistance (PBRA). Households receiving HUD PBRA assistance typically earn 30% or less than the AMI. The complex has nine three-bedroom units and one four-bedroom unit. The current project-based Section 8 contract is expiring in 2024.
- Commerce Senior Apartments (68 affordable units): Commerce Senior Apartments, owned by Commerce Senior Citizens Apartments, is a low income senior housing complex subsidized by HUD Section 8 Project-Based Rental Assistance (PBRA). Households receiving HUD PBRA assistance typically earn 30% or less than the AMI. The complex has 68 one-bedroom units. The current project-based Section 8 contract is expiring in 2027.
- Commerce Watcher Street Home (4 affordable units): This complex, also owned by JT Kinsey, has four one-bedroom units that are subsidized by HUD Section 8 Project-Based Rental Assistance (PBRA). Households receiving HUD PBRA assistance typically earn 30% or less than the AMI. The current project-based Section 8 contract is expiring in 2024.

## **Conversion Risk**

~~Commerce's assisted units are all at risk based on the expiration of restrictions for low income use through various financing sources or expiration of Section 8 rental assistance contracts. However, while the units described in Table 2-30 may meet the definition of at risk of conversion as described in Government Code Section 65583, the risk of conversion for two of these complexes is low because they are owned by The East Los Angeles Community Union (TELACU), whose mission as a nonprofit organization is to provide affordable housing for seniors. The three projects with Section 8 contracts have been in place for over 40 years and are likely to continue renewing the five-year contracts.~~

### **Preservation and Replacement Options**

Preservation or replacement of at-risk projects can be achieved in several ways: 1) transfer of ownership to non-profit organizations; 2) provision of rental assistance other than through the Section 8 program; 3) replacement or development of new assisted multi-family housing units; 4) purchase of affordability covenants; and/or 5) refinance of mortgage revenue bonds on bond funded units. These options are described below, along with a general cost estimate for each. Financial resources available include bond financing, as well as CDBG and HOME funds, Section 8 rental assistance, low income housing tax credits, and Proposition 1C funds.

### **Transfer of Ownership**

The California Department of Housing and Community Development (HCD) keeps a current list of all of the qualified entities across the State. A “qualified entity” is a nonprofit or for-profit organization or individual that agrees to maintain the long-term affordability of housing projects.

Efforts by the City to retain low-income housing must be able to draw upon two basic types of preservation resources: organizational and financial. Qualified, non-profit entities need to be made aware of the future possibilities of units becoming at risk. Groups with whom the City has an ongoing association are the logical entities for future participation. The following qualified entities serving Los Angeles County may have the potential to acquire and preserve the at-risk units identified in Commerce:

- **Abode Communities**
- **American Family Housing**
- **Century Housing Corporation**
- **LTSC Community Development Corporation**
- **Many Mansions**
- **Orange Housing Development Corporation**
- **National CORE**
- **TELACU**

~~An online survey on Redfin in December 2022 shows several multi-family rental properties for sale in Commerce, Montebello and East Los Angeles, averaging \$273,729 per unit.~~

The actual market value at time of sale will depend on market and property conditions, lease-out/turnover rates, among other factors.

Current market value for the units is estimated on the basis of the project's potential annual income and operating and maintenance expenses. As indicated in Table 2-31, the estimated market value of the at-risk units is \$24.4 million. This estimate is provided for the purpose of comparison and understanding the magnitude of costs involved and does not represent the precise market value of this project. The actual market value at time of sale will depend on market and property conditions, lease-out/turnover rates, among other factors.

**Table 2-31: Market Value of At-Risk Units**

<u>Unit Information</u>	<u>At-Risk Units</u>
<u>1-BR</u>	<u>72</u>
<u>3-BR</u>	<u>9</u>
<u>4-BR</u>	<u>1</u>
<u>Total</u>	<u>82</u>
<u>Annual Operating Cost</u>	<u>\$583,583</u>
<u>Gross Annual Income</u>	<u>\$5,239,032</u>
<u>Net Annual Income</u>	<u>1,955,449</u>
<u>Market Value</u>	<u>\$24,443,112</u>

*Market value for project is estimated with the following assumptions:*

*Average market rent based on Fair Market Rents (FY 2023) established by HUD. One-bedroom unit = \$1,747; two-bedroom unit = \$2,222; three-bedroom unit = \$2,888; four-bedroom unit = \$3,170.*

*Average size is assumed to be 600 square feet for a one-bedroom, 850 square feet for a two-bedroom, 1,200 square feet for a three-bedroom, and 1,500 square feet for a four-bedroom.*

*Annual income is calculated on a vacancy rate = 5%*

*Annual operating expenses per square foot = \$10.52 (NAAHQ, Operating Income and Expense Data for All Subsidized Properties, 2021).*

*Market value = Annual net project income\*multiplication factor*

*Multiplication factor for a building in good condition is 12.5.*

## Replacement of Units

The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs and type of construction. In 2020, the UC Riverside’s Center for Economic Forecasting and Development reported that per-unit costs for a 75-unit development ranged from \$476,149 in Oxnard to \$579,133 in Los Angeles.<sup>7</sup> Using the LA County figure from this study, replacing the 235 potentially at-risk units would likely cost at least \$136 million.

## Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Section 8 vouchers, the City through a variety of potential funding sources could provide assistance to very low income households. The level of the subsidy required to preserve the at-risk affordable housing is estimated to equal the Fair Market Rent for a unit minus the housing cost affordable by a very low income household.

Table 2-32 shows the rental subsidies required for the at-risk units. The level of the subsidy required to preserve the at-risk affordable housing is estimated to equal the Fair Market Rent for a unit minus the housing cost affordable by a very low income household. As shown, subsidizing the 82 very low income at-risk units would require approximately \$94,172 a month (\$1,130,064 annually) while the low income at-risk units would require approximately \$9,990 a month (\$119,880 annually) in subsidies.

**Table 2-32: Rental Subsidies Required**

Unit Size	Total Units	Fair Market Rent	Household Size	Household Annual Income	Affordable Cost (Minus Utilities)	Utility	Per Unit Subsidy	Monthly Subsidy(all units)
1-BR	72	\$1,747	2	\$47,650	\$958	\$233	\$1,022	\$73,584
3-BR	9	\$2,888	4	\$59,550	\$1,173	\$316	\$2,031	\$18,279
4-BR	1	\$3,170	5	\$64,350	\$1,235	\$374	\$2,309	\$2,309
Total	82	---	---	---	---	---	---	\$94,172

Unit Size	Total Units	Fair Market Rent	Household Size	Household Annual Income	Affordable Cost (Minus Utilities)	Utility	Per Unit Subsidy	Monthly Subsidy(all units)
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<sup>7</sup>Chong, Hoyu. (February 2020). “Economy White Paper Series: Demystifying the High Cost of Multifamily Housing Construction in Southern California.” UC Riverside’s Center for Economic Forecasting and Development. [https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR\\_CEFD\\_Multifamily\\_Housing\\_White-Paper\\_3\\_2020.pdf](https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR_CEFD_Multifamily_Housing_White-Paper_3_2020.pdf)

**Very Low Income (50% AMI)**

1-BR	100	\$1,747	2	\$47,650	\$958	\$233	\$1,022	\$102,200
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**Low Income (80% AMI)**

1-BR	135	\$1,747	2	\$76,250	\$1,906	\$233	\$74	\$9,990
<b>Total</b>	<b>235</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>\$112,190</b>

Source: Veronica Tam & Associates, 2022.

Notes: Fair Market Rents (FMR) FY 2023, Los Angeles-Long Beach-Glendale, CA are determined by HUD.

Los Angeles County 2022 Area Median Household Income (AMI) limits set by the California Department of Housing and Community Development (HCD).

Affordable cost = 30% of household income minus utility allowance from the LACDA 2022 Utility Allowance Schedule.

### Replacement of Units

The construction of new low income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs and type of construction. Estimated new construction costs for the three at-risk affordable housing projects are shown in Table 2-33. The replacement of the 82 at-risk units would require approximately \$152,287 per unit. However, this cost estimate does not include land, permits, on- and off-site improvements, and other costs.

**Table 2-33: Estimated Construction Costs to Replace At Risk Units**

Unit Size	(A) Total Units	(B) Estimated Average Unit Size	(C) Estimated Gross Building Size	(D) Estimated Gross Building Costs
1-BR	72	600	\$51,840	\$9,720,000
3-BR	9	1,200	\$12,960	\$2,430,000
4-BR	1	1,500	\$1,800	\$337,500
<b>Total</b>	<b>82</b>	<b>---</b>	<b>---</b>	<b>\$12,487,500</b>
<b>Average Per Unit Cost</b>				<b>\$152,287</b>

Notes:

(C) = (A) x (B) x 1.20 (i.e., 20% inflation to account for hallways and other common areas)

(D) = (C) x \$150 (per square foot construction costs) x 1.25 (i.e., 25% inflation to account for parking and landscaping costs)

Construction cost an estimate only.

### Purchase of Affordability Covenants

Another option to preserve the affordability of the at-risk projects is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, providing a lump-sum payment, and/or supplementing the rents to market levels. The feasibility and cost of

this option depends on whether the complex is too highly leveraged and interest on the owner's part to utilize the incentives found in this option. By providing lump sum financial incentives or ongoing subsidies in rents or reduced mortgage interest rates to the owner, the City could ensure that some or all of the units remain affordable. While projects owned by nonprofit organizations have affordable housing as their mission and therefore the long-term use is typically not an issue, subsidies may be needed over time to subsidize the rents if Section 8 contracts are no longer available, or funds are needed for rehabilitation.

### **Cost Comparisons**

The above analysis attempts to estimate the cost of preserving the at-risk units under various options. However, because each project may have unique circumstances and therefore different options available, the direct comparison would not be appropriate. In general, providing additional incentives/subsidies to extend the affordability covenant would require the least funding over the long run, whereas the construction of new units would be the most costly option. Over the short term, providing rent subsidies would be least costly but this option does not guarantee the long-term affordability of the units.

The cost to build new housing to replace the 82 at-risk units is an estimated total cost of over \$12.4 million, excluding land, on- and off-site improvements, and permit fees. Transfer of ownership is estimated to be \$24.4 million. Both the construction of new housing and transfer of ownership would be substantially more expensive than providing rent subsidies (\$1,130,064 annually). However, rent subsidies do not provide long-term affordable housing. Further, rental subsidies over a 20-year period would ultimately be more costly than constructing replacement units or transfer of ownership.

## **Regional Housing Need Allocation**

The Regional Housing Needs Allocation (RHNA) is a critical part of State housing element law (Government Code Section 65580). The process for determining the RHNA is briefly described below:

- The State Department of Housing and Community Development uses a California Department of Finance growth projection and other factors to determine the number of housing units that are needed statewide over an eight-year planning period (for Commerce and other Southern California jurisdictions, this time period is 2021-2029).
- This statewide housing unit number (called the Regional Housing Needs Determination, or RHND), is divided into regions. Commerce is located within the Southern California Association of Governments (SCAG) region.

- SCAG is responsible for creating a methodology to distribute the RHND among all of its cities and counties. Each jurisdiction's housing unit number is called the Regional Housing Needs Allocation (RHNA).
- The RHNA is the number of units that a jurisdiction must plan for in the Housing Element update. The units are divided into four different categories based on median income: very low (earn <50 percent AMI), low (earn between 51 and 80 percent AMI), moderate (earn between 81 and 120 percent AMI) and above moderate (earn more than 120 percent AMI).

Almost all jurisdictions in the SCAG region received a larger RHNA this cycle compared to the last housing element cycle, primarily due to changes in state law that led to a considerably higher RHND compared to previous cycles.

Table 2-34 illustrates Commerce's RHNA by income category for the 2021-2029 planning period. Per State law, local jurisdictions are also required to provide an estimate for their projected extremely low income households (those earning 30 percent or less AMI). Jurisdictions can use half of their very low income RHNA allocation to make this projection. Therefore, Commerce is dividing the very low income allocation of 55 units in half to meet this state requirement.

**Table 2-34: Housing Need by Income Category for Commerce**

Extremely Low (0-30% AMI)	Very Low (30-50% AMI)	Low (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (>121% AMI)	Total RHNA
28*	27	22	39	131	247

*\*The City has a RHNA allocation of 55 very low income units (inclusive of extremely low income units). While the RHNA did not separately define housing needs for extremely low income households, the very low income allocation can be split evenly between very low- and extremely low income households.*

Source: SCAG 6<sup>th</sup> Cycle Final RHNA Allocation Plan, 7/1/2021



# CHAPTER 3: HOUSING CONSTRAINTS

A number of factors may constrain the development of housing, particularly housing affordable to lower-income households. These factors can generally be divided into “governmental constraints,” or those that are controlled by federal, state, or local governments; and “nongovernmental constraints,” factors that are not generally created or cannot be affected by government controls. This chapter also looks at the “infrastructure and environmental constraints” facing Commerce.

## Governmental Constraints

### Transparency In Developmental Regulations

To increase transparency and certainty in the development application process as required by law, the City provides a range of information online for ease of access, some of which is as follows:

- City General Plan: <https://www.ci.commerce.ca.us/Home/ShowDocument?id=76>
- City Zoning Ordinance (Title 19):  
[https://library.municode.com/ca/commerce/codes/code\\_of\\_ordinances](https://library.municode.com/ca/commerce/codes/code_of_ordinances)
- Planning Fees and Applications:  
<https://www.ci.commerce.ca.us/city-hall/economic-development-and-planning/planning/planning-applications-fees>
- Building and Safety Permit Fees and Applications:  
<https://www.ci.commerce.ca.us/city-hall/economic-development-and-planning/building-safety>
- Housing resources, including information on first time homeowner and home preservation grants:  
<https://www.ci.commerce.ca.us/city-hall/economic-development-and-planning/housing>

### Land Use Controls

#### General Plan

In January 2008, the City Council adopted the 2020 General Plan. The General Plan serves as a guide for development while recognizing unique features of Commerce, including:

- Commerce being a key employment and commercial center in the Los Angeles region;
- Addressing how the numerous quarries in the city will be used in the coming decades; and
- The need to protect livability of the community and embracing environmental justice to ensure that the community's rights are considered in future planning and development decisions.

### *Community Development Element*

The Commerce 2020 General Plan was adopted in 2008. The General Plan's Community Development Element includes the Land Use Plan for the city and includes several land use categories. A majority of the land in the city is designated for industrial uses (61 percent). Residential land uses make up less than ten percent of the City's land. Residential uses are allowed in the following categories:

- *Low-Density Residential.* Land uses within this land use category are characterized by single-family homes and correspond to the R-1 (single-family residential) zone district.
- *Medium-Density Residential.* The medium-density residential land use category corresponds to the R-2 (light multiple-family residential) zone district. Permitted uses within this land use designation include single-family homes and duplex units.
- *High-Density Residential.* This category of land use corresponds to the R-3 (medium multiple-family residential) zone district that provides for higher-density residential development, including multiple-family residential development.
- *Mixed-Use.* This land use designation applies to the Atlantic Boulevard corridor between the Mix-Master intersection (on the north) and Washington Boulevard (on the south). This land use provides for both residential development and commercial development. A new overlay zone will be prepared for this area along with design guidelines for new development.
- *Housing Opportunity Area.* This designation applies to the Rosewood Planning Area. This land use designation permits the existing manufacturing uses to recycle to residential development should the property owner desire to do so.

Table 3-1 shows the designations and corresponding development standards.

**Table 3-1: Commerce General Plan Residential Land Use Designations**

Land Use Designation	Typical Land Use and/or Development	Maximum Permitted Density	Corresponding Zone District
Low-Density Residential	Single-Family Residential Units	11 du/ac*	R-1
Medium-Density Residential	Single-Family & Duplex Units	17 du/ac	R-2
High-Density Residential	Multi-Family Residential Units	27 du/ac	R-3
Mixed-Use (Atlantic)	General Commercial/Office Mixed Use	27 du/ac	MU
Housing Opportunity Overlay	Mixed Use, Multi-family	27 du/ac	HOO

*Note: du/ac = dwelling units per acre*

*Source: City of Commerce 2020 General Plan (Tables 3-1 and 3-2); adopted January 2008*

The City is in the process of updating the General Plan, with adoption anticipated by the end of 2023. Table 3-2 shows the proposed land use policy's following changes to the land use designations. A key focus of the Land Use Element update is to provide additional residential and commercial opportunities in the ~~City~~. This theme was prominent in the public outreach done for the General Plan between 2018 and 2023 (please See Chapter 1 and Appendix A of this Element).

**Table 3-2: Preliminary Categories for Land Use Element Update**

GP Designation	Corresponding Zone Districts	Permitted Development	Density	MAX Intensity
Low-Density Residential	R1	Single-unit detached and attached	0 - 11 du/ac	N/A
Medium-Density Residential	R2	Small lot residential Single-unit detached and attached Duplex units Triplex units Multi-unit attached	11.1 - 17 du/ac	N/A
High-Density Residential	R3	Triplex units Multi-unit attached	17.1 - 27 du/ac	N/A
Housing Opportunity Area	M2 with HO Overlay	Small lot residential Single-unit attached Duplex units Triplex units Multi-unit attached Light manufacturing	11.1 - 40 du/ac	FAR: 1.0

GP Designation	Corresponding Zone Districts	Permitted Development	Density	MAX Intensity
Mixed-Use	New Designation	Small lot residential Single-unit attached Duplex units Triplex units Multi-unit attached Live/Work Adaptive reuse Retail Office Food/Entertainment	40 - 60 du/ac	FAR: 2.0 - 3.0*
Mixed Use/Atlantic	New Designation	Multi-unit attached Live/Work Mixed uses Office Retail	40 - 85 du/ac	FAR: 2.0 - 2.5*
Mixed Use/Washington 1	New Designation	Multi-unit attached Live/Work Mixed uses Office Retail Brewery/Winery/Distillery	40 - 85 du/ac	FAR: 2.0 - 3.0*
Mixed Use/Washington 2	New Designation	Office Retail Brewery/Winery/Distillery	N/A	FAR: 2.0 - 4.0*
Innovation	New Designation	Live/Work Neighborhood-serving retail Food establishments R&D	N/A	FAR: 1.0

Source: MIG, April 2023

### Modelo Specific Plan

In February 2022, the Commerce City Council approved the Modelo Specific Plan (Specific Plan). A specific plan effectively establishes a link between implementing policies of the General Plan and the individual development proposals in a defined area. The Specific Plan area is located in the southernmost portion of the city and includes the demolition of the existing Veterans Memorial Park located at 6364 Zindell Avenue, and an adjacent vacant parcel at 7316 E. Gage Avenue (collectively, the “Project Site”). The

Specific Plan outlines the redevelopment of the 17.37-acre Project Site to include the construction of up to 850 residential units, up to 165,000 square feet of commercial uses, a new public community center and museum, and approximately five acres of park and open space. The development agreement also includes 10 percent of housing units affordable to the workforce (up to 175 percent of the Area Median Income).

As part of adopting the Modelo Specific Plan, the following actions were taken by the City Council:

- General Plan Amendment with corresponding map amendments to change the General Plan land use designation from Residential, Public Facilities and Commercial Manufacturing to Modelo Specific Plan.
- Zone Change and corresponding map amendments to change zoning from C/M-1 (Commercial Manufacturing) and PF (Public Facility) to Modelo Specific Plan Zone.

The type of development included in the Specific Plan is unique in that it would be the first in the City of Commerce. Although the City's General Plan encourages mixed-use development, the Specific Plan is unique in that it is the first area identified within the City where a considerable mixed-use development could co-exist with other existing uses. The land use layout and design requirements in the Specific Plan will allow for a variety of residential, commercial and public space uses to be located in the same area. A mix of for-sale and for-rent residential uses will be located on the western side of the Specific Plan area. These uses include apartments, townhomes and live/work units. Development standards for the Specific Plan residential units, including minimum unit sizes, can be found in the Residential Development Standards section of this chapter. It should be noted that the Specific Plan has design types to meet the needs of various household sizes and makeups.

### **Local Ordinances**

Local ordinances are adopted by jurisdictions to help address specific or unique circumstances in the community. The City of Commerce has a density bonus ordinance, which is described below. Due to the City's large percentage of industrial and commercial zones and land uses, there are no growth control ordinances. Commerce also does not have an inclusionary housing ordinance.

### **Density Bonus**

The City's Density Bonus ordinance (Division 3 of Chapter 19.07 of the Zoning Ordinance) was last updated in 2013. The Ordinance outlines the following bonuses and incentives that are allowed:

- Very-low income, low income and senior citizen housing: One density bonus of 20 percent over the maximum density (senior housing: 20% over the number of units) if the following is met:
  - Very-low income: five percent of the total dwelling units
  - Lower income: ten percent of the total dwelling units
- Moderate Income: one density bonus of five percent if at least ten percent of the units are provided at affordable costs to moderate income households.

~~Since the City's Ordinance was last updated in 2013, Therefore, when reviewing density bonus applications, the City references and complies with Government Code §56915 when reviewing density bonus applications. This Housing Element includes a program to amend the Commerce Municipal Code to comply with the State Density Bonus law.~~

~~Recently enacts bills, including AB 1763 and AB 2345, have modified Government Code Section 65915-65918 to expand density bonus provisions. The new regulations include special provisions for projects that are 100 percent affordable, allowing a maximum density bonus of 80 percent in most cases, with no limitations on density for projects within one-half mile of a major transit stop. Additionally, the maximum density bonus for qualifying projects that include market rate units has been increased from 35 percent to 50 percent. This Housing Element includes a program to amend the Commerce Municipal Code to comply with the State Density Bonus law.~~

## **Residential Development Standards**

The City regulates the type, location, density, and scale of residential development primarily through the Zoning Ordinance. Chapter 19.07 of the City's Municipal Code outlines the purpose of Commerce's residential zones. Following adoption of the General Plan Update by the end of 2023, the City will update the Zoning Ordinance (see Table 3-2 above).

- *Low Density Residential Zone (R-1).* The purpose of the R-1 zone is to provide areas for the development of detached and attached single-family dwellings that incorporate private outdoor open spaces into individual living environments. The zone is intended to protect and stabilize desirable characteristics of single-family residential areas, such as minimum lot sizes and separation from incompatible land uses.
- *Medium Density Residential Zone (R-2).* The purpose of the R-2 residential zone is to provide an environment suitable for both single-family and duplex units. The intent is to promote desirable characteristics for medium-density living and to stabilize existing medium-density areas. Lots in the R-2 zone may accommodate one or two single-family detached units or duplex units.

- *High Density Residential Zone (R-3)*. The purpose of the R-3 zone is to provide opportunities for persons to live in medium- or high-density residential developments. Lots in this zone provide common open space areas and similar amenities. The R-3 zone is primarily intended to accommodate apartments and other multi-family dwellings, although single-family and duplex residences are also permitted.
- *Housing Opportunity Overlay (HOO)*. The HOO is established to facilitate the development of housing "by-right" on underutilized industrial sites. It is intended to be applied to properties that are currently zoned heavy manufacturing (M-2) and permits discontinued manufacturing uses to recycle to residential development.

Table 3-3 outlines the residential development standards in the City's Zoning Code.

**Table 3-3: Residential Development Standards**

	R-1	R-2	R-3	HOO
Density Range*	0-8.7 du/acre	8.71-14.52 du/acre (for duplex units)	21.78 du/acre	0 – 40 du/ac
Minimum Lot Area	4,000 sq. ft.	5,000 sq. ft./duplex unit; 3,000 sq.ft./unit for 2 single-family units	2,000 sq. ft./unit and not less than 7,500 sq. ft.	None required
Maximum Allowable Floor Area (all structures)	40% of the total area of the lot	1 unit = 40% of the total area of the lot. This standard does not apply to multiple units.	1 unit = 40% of the total area of the lot. This standard does not apply to multiple units.	---
Maximum Lot Coverage (including all structures, porches and patios)	45% of the total lot area (must also be within the allowable floor area)	1 unit = 45% of the total area of the lot. This standard does not apply to multiple units.	1 unit = 45% of the total area of the lot. This standard does not apply to multiple units	None
Minimum Dwelling Size	950 sq. ft.	850 sq. ft.	700 sq. ft. (1 bedroom) 850 sq. ft. (2 bedroom) 1,000 sq. ft. (3 bedroom) 1,150 sq. ft. (4+ bedroom)	500 sq. ft. (studio) 600 sq. ft. (1 bedroom) 800 sq. ft. (2 bedroom) 1,000 sq. ft. (3 bedroom)
Maximum Building Height	25 feet (2-story)	25 feet (2-story)	35 feet or 3-story, whichever is less	60 feet or 5 stories
Distance Between Buildings (Minimum)	10 feet 5 feet – accessory bldg	10 feet 5 feet – accessory bldg	20 feet; increase of 5 ft. for every 10 ft. of height, or fraction thereof, above 25 ft.	10 feet
Front Yard Setback (Minimum)	20 feet	20 feet	15 feet	0 feet minimum, 15 feet maximum
Side Yard Setback	3 feet minimum, 5 feet maximum	3 feet minimum, 5 feet maximum	5 feet each side	5 feet minimum

	R-1	R-2	R-3	HOO
Side Yard Setback-Corner Lot (Minimum)	Same as adjoining front yard, but not less than 10 feet	Same as adjoining front yard, but not less than 10 feet	10 feet where lot abuts a street	0 feet minimum, 15 feet maximum
Rear Yard Setback (Minimum)	15 feet	15 feet	15 feet	10 feet

Notes: HOO – Housing Opportunity Overlay, \*Du/acre = Dwelling Unit per Acre

Source: City of Commerce Municipal Code, accessed October 2022.

### Lot Size, Setbacks and Building Height Standards

Lot size, setbacks and building heights for residential uses are defined in the City’s Zoning Code and shown in [Table 3-3](#)~~Table 3-3~~[Table 3-2](#). For the R-1 zone, the minimum lot size is 4,000 square feet and the minimum dwelling unit size is 950 square feet. The maximum building height is 25 feet (for a two-story building) and setbacks are as follows: 20 feet for the front, 3 to 5 feet for the side (minimum of 10 feet for a corner lot) and 15 feet for the rear setback.

For the R-2 zone, the minimum lot size is 5,000 square feet for duplex units and 3,000 square feet per unit for 2 single-family units. The minimum building size is 850 square feet. Building height and setbacks are the same as the R-1 zone.

The R-3 zone offers more flexibility in the standards, including lot coverage, height and setbacks to allow for multi-family development. The HOO zone offers even greater flexibility with reduced requirements. No minimum lot area is required and the building height (5 stories/60 feet) and reduced setbacks allow for a variety of housing designs and types to be developed. Chapter 19.47 of the Municipal Code includes additional development and design standards for live/work and mixed-use units in the HOO zone. However, the minimum unit sizes in R-3 and HOO zones may constrain the development of micro units, live/work units, and other alternative housing arrangements such as single-room occupancy (SRO) units. This Housing Element includes a program action to review and adjust the minimum unit sizes to accommodate a range of housing unit types. There are also inconsistencies between the General Plan densities and the allowable densities under the implementing Zoning Code. State law requires that the Zoning Code implements the range of densities provided in the General Plan. For example, the R-3 zone implements the General Plan High Density Residential designation but allows a density of 21.78 units per acre, below the General Plan’s 27 units per acre density envisioned. This Housing Element includes a program action to align the General Plan and Zoning Code densities. More specifically, a comprehensive Zoning Code update is needed to implement the proposed General Plan Land Use Policy. The Zoning Code update will ensure that appropriate development standards are established to facilitate the achievement of maximum allowable density in the respective zones.



## Parking

Parking standards for residential development are in Chapter 19.21 of the Municipal Code. The requirements are summarized in Table 3-4. Single-family homes have a requirement of two parking spaces in a garage, plus one additional space for homes with five or more bedrooms. Duplexes must have a two-car garage for each unit. Multi-family parking depends on the unit size: studios and one-bedrooms must have one garage space per unit while units with two or more bedrooms must have two garage spaces per unit. Guest parking for multi-family projects is ½ space per unit and may be uncovered. Compact spaces are also required when there are 20 or more overall spaces in the complex.

The HOO Zone allows for a variety of parking layouts to facilitate mixed-use and multi-family development. This includes surface parking, garage/tuck-under parking (in certain areas), underground/podium parking and above-ground parking structures.

**Table 3-4: Commerce Residential Parking Standards**

	Resident/Guest Parking	Compact Space Requirements
Single-Family	2-car garage for each unit, plus one additional space in the garage per unit for each bedroom in excess of four. For the purpose of parking, dens shall be considered bedrooms.	N/A
Duplex	2-car garage for each unit	N/A
Multi-family		
Efficiency/1-bedroom	1 space per unit within a garage; plus ½ guest space per unit (guest spaces may be uncovered)	Maximum 10% where 20+ spaces are provided
2 or more bedrooms	2 spaces per unit within a garage; plus ½ guest space per unit (guest spaces may be uncovered)	Maximum 10% where 20+ spaces are provided

*Source: City of Commerce Municipal Code, accessed October 2022*

Table 3-5 looks at the parking requirements in surrounding jurisdictions to determine if Commerce's standards provide a constraint to development. All neighboring cities require a two-space garage for single-family homes and the cities of Downey and Maywood have similar requirements to Commerce for additional spaces for larger homes. In terms of multi-family development, Commerce is the only city that allows for one space per unit for smaller dwellings. This provides for greater flexibility in multi-family projects. The City also offers developers the option to utilize a density bonus and is flexible with required parking requirements for specific types of residents, including the elderly.

Under the Accessory Dwelling Unit Chapter (19.07.090), tandem parking is allowed on an existing driveway, or on a driveway, a side yard setback or a rear yard setback. Additionally, housing development may provide onsite tandem parking or uncovered parking, but not through on street parking (19.07.240). It should be noted that the parking standards in the Modelo Specific Plan area are one space per bedroom (please see [Table 3-6](#)~~Table 3-6~~[Table 3-5](#)). However, the garage parking and guest parking requirements for multi-family housing may be a constraint to development. This Housing Element includes a program action to address the parking requirements, including updating the Zoning Ordinance.

**Table 3-5: Residential Parking Standards in Commerce and Surrounding Communities**

	Single Family	Multi-Family
Bell	2 parking spaces/unit in a garage	2 spaces/unit in a garage, 1 guest open space for every 3 units
Commerce	2-car garage for each unit, plus one additional space in the garage per unit for each bedroom in excess of four. For the purpose of parking, dens shall be considered bedrooms.	Efficiency/1 bdrm: 1 space per unit within a garage plus ½ guest space per unit (uncovered) 2+ bdrms: 2 spaces/unit in a garage, ½ guest space per unit (may be uncovered)
Downey	2 enclosed spaces for units with less than 3,375 sq. ft., 3 enclosed spaces for units between 3,375 and 4,500 sq. ft., 4 enclosed spaces for units with 5,000 sq ft or greater	2 covered spaces within a garage, plus 0.5 guest space per unit
Maywood	2 covered spaces for 3 or fewer bedrooms, one additional uncovered space for each additional bedroom)	3 or fewer bdrms: 2 covered spaces/unit plus ½ guest space per unit, 4+ bdrms – 2 covered spaces/unit for first 3 bdrms then 1 space/bdrm for each addtl bdrm, 1/3 guest space per unit
Montebello	2 enclosed spaces per unit	2 enclosed spaces/unit, plus 1 guest space per 3 units
Pico Rivera	2 spaces in a garage	2 spaces in a garage/carport per unit. For developments with 8+ units, one open guests unit per 8 units.

Source: *Cities' Zoning Codes, accessed October 2022.*

## Modelo Specific Plan Development Standards

As described earlier, the Modelo Specific Plan (adopted in February 2022) includes the construction of up to 850 residential units. The Specific Plan outlines the development standards for these uses (Table 3-6).

**Table 3-6: Modelo Specific Plan Development Standards**

	Specific Plan Standard
Minimum Dwelling Size	Efficiency unit: 500 sq. ft. 1-bedroom: 600 sq. ft. 2-bedroom: 825 sq. ft. 3-bedroom: 950 sq. ft.
Setbacks	No required setbacks
Outdoor Space	At least 50% of the units shall have dedicated outdoor balcony or space. Any common outdoor space shall have a minimum level surface dimension of twenty (20) feet and minimum area of four hundred (400) square feet.
Height	Zone A (closest to Interstate 5) –eight (8) stories or 110 feet, whichever is greater. Zone B (middle portion of Plan area) –seven (7) stories or eighty-five (85) feet, whichever is greater. Zone C (western portion of Plan area) – four (4) stories or sixty (60) feet, whichever is greater.
Parking	1,393 parking spaces dedicated to residential uses, but no less than one (1) parking space per bedroom.

*Source: Modelo Specific Plan, adopted February 2022.*

## Cumulative Impacts of Land Use Controls

Commerce’s development regulations include parking, building height and lot requirements that may have an impact on achieving maximum allowable density in certain residential zones. However, the following shows that the City is working to remove these constraints:

- Objective Design/Development Standards: Objective standards are generally defined by state law as standards that involve no personal or subjective judgment and that rely on a uniform benchmark or criterion available and knowable prior to application submittal. A program has been included in this Element for the City to hire a consultant by December 2024 to develop objective design/development standards for residential areas. The program objective includes developing objective standards to ensure maximum allowable densities can be achieved.

- The City's Density Bonus ordinance (Division 3 of Chapter 19.07 of the Zoning Ordinance) was last updated in 2013. Therefore, when reviewing density bonus applications, the City references and complies with Government Code §56915. This Housing Element includes a program to amend the Commerce Municipal Code to comply with the State Density Bonus law.
- Following adoption of the General Plan Update by the end of 2023, the City will update the Zoning Ordinance to ensure that the City is in compliance with State law. This will include updates to the ADU, Density Bonus, employee housing, SRO, emergency shelter and low-barrier navigation center provisions, among others.
- Other Zoning Code updates:
  - Parking: E—establish appropriate parking standards to facilitate multi-family housing and mixed use development. The Zoning Ordinance update will include language that includes other parking incentives such as shared parking and tandem parking for eligible projects.
  - Review and adjust the minimum unit sizes to accommodate a range of housing unit types.
  - Ensure that appropriate development standards are established to facilitate the achievement of maximum allowable density in the respective zones.

### **Provision For a Variety of Housing Types**

Housing element law requires jurisdictions to identify available sites in appropriate zoning districts with development standards that encourage the development of a variety of housing types for all income levels, including multi-family rental housing, factory-built housing, mobile homes, emergency shelters, and transitional housing. Table 3-7 below summarizes the various housing types permitted within the City's zoning districts and the Modelo Specific Plan.

Besides single-family homes, the City provides for various other housing types to meet the needs of the community, including persons earning lower incomes and seniors, among others.

**Table 3-7: Housing Types Permitted By Zone**

Housing Type	R-1	R-2	R-3	C-2	M-1	HOO	PF	MSP
Single-family	P	P	P	P	---	---	---	---
Single-family (> than 2,300 sf)	C	C	C	---	---	---	---	---
Duplex (2 units)	---	P	P	---	---	---	---	---
Multi-family	---	---	P	P	---	P	---	P
Accessory Dwelling Units	P	P	P	---	---	---	C <sup>1</sup>	---
Junior Accessory Dwelling Units	P	---	---	---	---	---	---	---
Mixed-Use and Live/Work	---	---	---	---	---	P	---	P
Manufactured/Mobile Homes	P	P	P	---	---	---	---	---
Care Facilities (6 or fewer persons)	P	P	P	---	---	P	---	P
Care Facilities (7 or more persons)	---	---	C	C	---	C	C	C
Nursing Homes/Rest Homes	---	---	C	---	---	C	---	---
Emergency Shelters	---	---	---	---	P/C <sup>2</sup>	---	---	---
Supportive Housing	P	P	P	---	---	P	---	---
Transitional Housing	P	P	P	---	---	P	---	---

Notes: P = Permitted, C = Conditional Use, --- = Not Permitted

R-1 = Low-Density Residential zone, R-2 = Medium-Density Residential zone, R-3 = High-Density Residential zone, C-2 = Commercial zone, M-1 = Light Manufacturing zone, HOO = Housing Opportunity Overlay, PF = Commercial Public Facilities zone, MSP = Modelo Specific Plan

1. In the PF zone, accessory dwelling unit refers to a residential unit that is accessory to a commercial or institutional use (i.e., a religious facility), not a primary residential unit. The requirements of Government Code Section 65852.2 do not apply.
2. Shelter with up to 30 occupants is permitted, more than 30 requires a conditional use permit

Source: City of Commerce Municipal Code, Title 19. Accessed October 2022.

## Single-Family Homes

A “Single-Family Dwelling” is defined in the City’s Municipal Code as a detached building containing no more than one dwelling unit. Single-family homes that are 2,300 square feet or less in size are permitted in the City’s three residential zones and allowed as an accessory use in the C-2 zone. For homes larger than 2,300 square feet, a conditional use permit is required to ensure that the home’s size is compatible with the existing neighborhood. However, permitting single-family homes in the multi-family or mixed use zones essentially reduces the opportunity for multi-family housing. This Housing Element includes a program action to establish a minimum density in the multi-family and mixed use zones.

## Duplexes and Multi-Family Housing

Duplexes are defined as means a building containing two dwelling units designed for the independent occupancy of two households.

In 2021, Senate Bill (SB 9) was passed by the State legislature. SB 9 requires ministerial approval for the subdivision of a parcel in a single-family residential zone into two parcels.<sup>1</sup> This Housing Element includes a program for the City to facilitate ministerial approvals for lot splits in the R-1 zone.

Multi-family dwellings are a building or a portion thereof containing three or more dwelling units designed for the independent occupancy of three or more households. Duplexes are permitted in the R-2 and R-3 zones. Multi-family units are permitted in the R-3 and HOO zones. Multi-family units are also be permitted within the Modelo Specific Plan Area. As stated above, this Housing Element includes a program action to establish a minimum density in the multi-family and mixed use zones.

## Accessory Dwelling Units

An Accessory Dwelling Unit (ADU) is defined as a permanent dwelling that is accessory to a primary dwelling on the same property. An ADU provides complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, sanitation, and parking, and if attached to the primary dwelling, is provided exterior access separate from the primary dwelling. ADUs may be attached or detached from the primary dwelling unit.

A Junior ADU (JADU) is no more than 500 square feet in size and contained entirely within an existing or proposed single-family structure. A JADU may include separate sanitation facilities, or may share sanitation facilities with the primary dwelling.

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<sup>1</sup> California Department of Housing and Community Development, *SB 9 Fact Sheet On the Implementation of Senate Bill 9 (Chapter 162, Statutes of 2021)*, March 2022. [www.hcd.ca.gov](http://www.hcd.ca.gov)

Over the last few years, the State legislature has passed a series of bills aimed at encouraging the development of ADUs. These bills include: AB 68, AB 587, AB 881, and SB 13, effective January 1, 2020; and, AB 2221 and SB 897, effective January 1, 2023.

The City last updated its ADU standards in August 2020 (Ordinance No. 761) to comply with California Government Code Sections 65852.2 and 65852.22. The existing ordinance complies with State requirements pertaining to unit size, location, and number of units permitted, parking, and other provisions. However, with the passage of AB 2221 and SB 897, the City's ordinance does not comply with new height requirements and other minor provisions required by State law as of January 1, 2023. Therefore, updating the City's ADU provisions has been included as a Housing Program in this Housing Element.

### **Mixed-Use and Live/Work**

The Housing Opportunity Overlay (HOO) and the Modelo Specific Plan both allow for mixed use development. The Municipal Code outlines the requirements for the HOO zone, including the requirements for parking, lighting, architectural design and pedestrian-oriented features.

One of the primary goals of the Modelo Specific Plan is to “provide a new mixed-use residential, commercial, retail, entertainment, and civic community furthering the General Plan’s land use, economic development and urban design objectives”. As planned, the Specific Plan Area will include a maximum of 850 residential units and a maximum of 165,000 square feet of commercial space. The Specific Plan also allows for Live/Work units and provides development standards to ensure compatibility of uses.

### **Emergency Shelters and Low-Barrier Navigation Centers**

As outlined in the Needs Assessment chapter of this Housing Element, the 2022 Point-in-Time Count found a total of 83 unsheltered persons in Commerce. Of these persons, over half (55 percent) were in some type of vehicle, such as cars, vans or RVs. Persons in makeshift shelters comprised 30 percent of those counted.<sup>2</sup>

An emergency shelter is defined in the Municipal Code as a facility that provides immediate and short-term housing and supplemental services to homeless persons or families. Supplemental services may include food, counseling, and access to social programs.

Chapter 19.31.670 outlines the standards and regulations for emergency shelters in Commerce. A shelter with up to 30 occupants is permitted in the Light Manufacturing (M-1) Zone and does not require a discretionary review. However, there are development

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<sup>2</sup> While the LAHSA has released data from the 2023 PIT Count, at the time of this report writing, the information is only at the County and SPA levels and does not include information at the City level. Therefore, the 2022 information was used instead to provide a consistent picture for LA County and the City of Commerce.



standards and regulations that need to be met. A shelter with more than 30 occupants requires a conditional use permit. Other uses permitted in the M-1 zone include certain types of manufacturing, transportation-related services, job training establishments and vocational schools. A minimum distance of three hundred feet shall be maintained from any other emergency shelter and 1,000 feet from a variety of uses such as schools, parks, and senior housing. Parking is established at one space per four beds, and/or 0.5 per bedroom designated as a family unit with children, plus one space per staff member. In light of changes to State law in recent years, including AB 139 and AB 2339, the City's emergency shelter standards need to be updated to comply with new requirements as detailed later in this section.

Enacted in 2019, AB 101 requires cities to allow Low Barrier Navigation Centers (LBNCs) by-right in zones permitting multi-family and mixed-uses, if the LBNC meets specified requirements. A LBNC 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." Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. AB 101 also sets forth a specific timeline that cities must follow in the review of LBNCs. AB 101 sunsets in 2026.

A program is included in this Housing Element to amend the Municipal Code to ensure the City complies with all applicable requirements in State law, including:

- AB 139: The City must permit by-right emergency shelters with adequate capacity to serve the number of individuals identified in the most recent point-in-time homeless count. Parking standards for emergency shelters shall be based on the number of employees only. The only distance requirement allowable is a maximum 300 feet from another shelter; no other distance requirements are permitted.
- AB 2339: Emergency shelters must be allowed as a permitted use in one or more residential or mixed-use zones. The City currently permits emergency shelters in the M-1 zone where residential uses are not permitted. This zone is not considered appropriate for emergency shelters.
- AB 101: Low Barrier Navigation Centers that meet specified requirements shall be permitted by-right in mixed use zones and other nonresidential zones permitting multifamily residential development. Cities must take action on applications for Low Barrier Navigation Centers within a timeline specified in State law.

As designating emergency shelters as a permitted use in the M-1 zone no longer conforms with State law (AB 2339), the City may consider allowing emergency shelters by right in the new Mixed Use or Mixed Use/Atlantic designations where multi-family, mixed use, and live/work housing, among other housing types are permitted. Based on



the new AB 2339 requirement of 200 square feet of space per person, a building area of 6,000 square feet is needed for a shelter for up to 30 persons. The proposed Mixed Use and Mixed Use/Atlantic areas contain 79 parcels, totaling 52 acres. Average size of parcels in these areas is 0.66 acre. These parcels are primarily occupied by older commercial or office buildings that are single-story structures. Average existing FAR on these properties is 0.36, significantly below the allowable FAR under the proposed General Plan update. Median age of existing structures is 1951. Furthermore, 16 parcels are vacant (including five publicly owned land and 11 privately owned land). There is sufficient capacity to accommodate the City's homeless should shelters be proposed. Several transit lines run along or adjacent to Atlantic Boulevard, providing public transportation opportunities and access to services and facilities, including the Metro Bus Line 260 and the Commerce Transit Center. The Commerce Public Library is also located on Atlantic Boulevard.

### Supportive and Transitional Housing

The Commerce Municipal Code contains provisions for supportive, transitional, and single room occupancy housing, and includes the following definitions:

- Supportive Housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (per Health and Safety Code Section 50675.14(b)).
- Transitional Housing and Transitional Housing Development means temporary rental housing intended for occupancy by homeless individuals or families transitioning to permanent housing that is operated under program requirements calling 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 (per Health and Safety Code Section 50675.2(h)).

Supportive and transitional housing are permitted in the City's residential zones as well as the HOO zone. ~~Municipal Code section 19.31.680 has specific requirements for SROs, including the length of stay (30 days to 12 months), a maximum of two persons per unit, unit size of 150 to 400 square feet and a separate bathroom containing a water closet, lavatory and bathtub or shower for each unit.~~ However, transitional and supportive housing are not permitted in the C-2 zone where residential uses are also permitted. Therefore, this Housing Element includes an action to address this discrepancy and comply with AB 2162).

### **Single Resident Occupancy (SRO) Units**

Singe Resident Occupancy (SRO) units are included in the City’s definition of Transitional Housing and are permitted in the City’s R1, R2 and R3 zones. Municipal Code section 19.31.680 has specific requirements for SROs, including the length of stay (30 days to 12 months), a maximum of two persons per unit, unit size of 150 to 400 square feet and a separate bathroom containing a water closet, lavatory and bathtub or shower for each unit.

Applications for SRO (efficiency) units projects shall be processed in a manner consistent with procedures for a multiple-family residential project. A site plan review is required for projects with five or more units and the Planning Commission serves as the decision maker. Projects with four or fewer units are reviewed at the Community Development Director level. A program has been included to clarify the provision of SRO housing in mixed use zones.

### **Employee and Farm Employee Housing**

The Employee Housing Act (Health and Safety Code Section 17021.5) requires that employee housing for six or fewer employees be deemed as a residential use, subject to the same standards as single-family residences. While the Municipal Code allows for caretaker quarters as an accessory use in the M-1 zone, there are no allowances for employee housing in the residential zones as required by the Employee Housing Act. An amendment to the Municipal Code to comply with this requirement is included in the Housing Programs of this Housing Element.

According to the 2016-2020 American Community Survey, there were approximately 58 Commerce residents employed in agriculture related occupations. There are also no agricultural zoning in the City or zones where commercial agricultural operations are permitted. Due to the low number of agricultural employees residing within the City, there is not a need for specialized farm employee housing beyond those provided to all lower income households.

### **Housing for Persons with Disabilities**

The Needs Assessment chapter of this Housing Element includes recent data about disabled residents in Commerce. In 2020, 13.4 percent of Commerce’s population had a disability. The most prominent disability was ambulatory difficulties (7.2 percent), followed by independent living difficulties (6.9 percent) and cognitive difficulties (6.5 percent). State Department of Developmental Services (DDS) data estimates the number of individuals with developmental disabilities that are served by State services. Zip code 90022 had 892 individuals utilizing services, zip code 90023 had 658 individuals and zip code 90040 had 170 individuals. It should be noted that zip code 90022 covers areas

outside of the City of Commerce. Most persons experiencing a developmental disability reside in the home of a parent, family, or guardian.

### *Community Care Facilities*

As defined in the City's Municipal Code, Community Care Facility means any facility, place, or building which is maintained and operated to provide nonmedical residential care, day treatment, adult day care, foster care, or agency services to children and/or adults including, but not limited to, physically handicapped, mentally impaired, the mentally incompetent, substance abusers, battered persons, and abused or neglected people.

The Commerce Municipal Code allows community care facilities with seven or more residents with approval of a conditional use permit in the R-3, C-2 and PF zones (see [Table 3-7](#)~~Table 3-7~~~~Table 3-6~~). Section 19.07.130 of the Municipal Code contains regulations pertaining to community care facilities with seven or more residents. While the Municipal Code contains no development standards specific to this use, Section 19.07.130 contains findings that the planning commission may use as grounds for denying a conditional use permit for a community care facility:

1. Approval of the proposed facility would result in an overconcentration of such facilities within the neighborhood where the facility is to be operated. For the purposes of this Title 19, "overconcentration" shall mean that one or more similar approved uses is located within three hundred feet of the proposed facility; or
2. The proposed facility is located within one mile of an elementary school and a person who has been convicted of a sex offense against a minor, pursuant to Section 1564 of the Health and Safety Code, resides in the facility and such residence will continue after the permit is granted; or
3. Such use cannot be sufficiently conditioned to make it compatible with surrounding uses.

Pursuant to Section 19.07.120 of the Commerce Municipal Code, "a community care facility or group home which serves six or fewer residents shall be considered a residential use of property" and is not subject to the standards which apply to larger facilities which house seven or more clients. Therefore, small facilities that house six or fewer clients are permitted by right in the City's residential zones. However, residential care facilities for seven or more are not permitted or conditionally permitted in zones that permit housing. [A program in this Element calls for the City to amend the Zoning Ordinance to conditionally permit large community care facilities in zones where residential uses are permitted.](#)

### *Definition of Family*

The Municipal Code defines “Family” as one or more persons, related or unrelated, living together as a single integrated household in a dwelling unit. This definition does not place any constraints on the development of housing for persons with disabilities, such as group homes.

### *Building Code*

The City complies with the Federal Americans with Disabilities Act (ADA). The City adopted the 2023 Los Angeles County Building Code, which included the and the 2022 most recent California Building Code regulations (Commerce Municipal Code Chapter 15.07).

The City’s Code Enforcement division is complaint driven. Between July 1, 2020 and June 30, 2023, 701 residential cases were opened. The reasons for those cases are as follows:

- 5 Zoning Cases
- 6 Business License Violations
- 14 Garage Conversions Violations
- 8 Hazardous Conditions
- 5 Health and Welfare Violations
- 28 Illegal Constructions
- 7 Permit Violations
- 628 Public Nuisance Violations

Code Enforcement conducted a windshield survey of the residential areas of the city and estimated that there are 180 to 200 housing units in need of rehabilitation or replacement. This represents approximately five to six percent of the City’s total housing units. Most residential Code Enforcement cases are concentrated within the Bandini neighborhood in the northwestern portion of the City.

The City’s Neighborhood Fix Up Grant Program provides money for housing repairs and alterations that are visible from the street. The CDBG Home Preservation Grant Program provides funds to qualified applicants to complete improvements to their residence. The City’s website includes information on the grant program’s guidelines as well as an interest form for residents to fill out and submit to the Economic Development and Planning Department.

### *Reasonable Accommodation*

Commerce Municipal Code Chapter 19.07, Division 4 provides a formal procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. Applicants may request a reasonable accommodation in zoning and other

land use regulations, policies, practices and procedures per the Municipal Code. The Community Development Director or an appointed designee has the authority to review and decide upon requests for reasonable accommodation. The Community Development Director or appointed designee may refer the matter to the planning commission, as appropriate. The required findings of approval include:

1. The housing, which is the subject of the request, will be used by an individual disabled as defined under the acts.
2. The requested reasonable accommodation is necessary to make specific housing available to an individual with a disability under the acts.
3. The requested reasonable accommodation would not impose an undue financial or administrative burden on the city.
4. The requested reasonable accommodation would not require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning.
5. The requested reasonable accommodation would not adversely impact surrounding properties or uses.
6. There are no reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the city's applicable rules, standards and practices.

In granting a request for reasonable accommodation, the reviewing authority may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings required above.

The Planning Commission also has the authority to review and decide upon requests when they include any encroachment into the front yard setback area, results in a building size increase above what is allowed in the applicable zoning district with respect to height, lot coverage and floor area ratio maximums, or whenever a reduction in required parking is requested.

The required finding relating to adverse impact on surrounding properties or uses can be considered subjective and constraining to the development or improvement of housing for persons with disabilities. This Housing Element includes a program action to remove the subjective finding. [In addition, a program has been included in this Element for the City to hire a consultant by December 2024 to develop objective design/development standards for residential areas.](#)

## **Planning and Development Fees and Processing**

## Fees

The City collects various fees from developers to cover the costs of processing permits and providing necessary services and infrastructure. These fee schedules are available on the City's website: <https://www.ci.commerce.ca.us/city-hall/economic-development-and-planning>. Table 3-8 shows the latest planning fees for the City.

Development impact fees are also collected for development projects. In accordance with California law, these are collected at the time the City issues certificates of occupancy. The Montebello Unified School District (MUSD) and Los Angeles Unified School District (LAUSD) both levy a school development fee for residential construction. These fees are paid directly to the County by the project applicant. Table 3-9 shows the fees in Commerce compared to that of other jurisdictions. As shown, a wide range of fees is seen in the subregion. Commerce is in the middle to higher end of the range.

To better illustrate the development fees for residential units in the City, Table 3-10 Table 3-9 generally provides the total fees charged per unit for both single family and multi-family developments. In general, the City's fee structure charges lower fees for multi-family housing construction on a per unit basis. For the single family home, the valuation was \$200,844. Fees totaling \$8,460 comprised four percent of the total valuation. For the multi-family project, the valuation per unit was \$183,000. The fees (totaling \$7,530.24) comprised four percent of the total project cost.

**Table 3-8: City of Commerce Planning Fees, and Processing Times and Decision-Making Body**  
(through August 31, 2023)

<u>Application Type</u>	<u>Fee Per Application</u>	<u>Processing Timeline</u>	<u>Approval Body</u>
<u>General Plan Amendment</u>	<u>\$6,363.70</u>	<u>6-12 months</u>	<u>(Example: Planning Commission Recommendation (1 hearing) then City Council approval (1 hearing))</u>
<u>Zone Change</u>	<u>\$6,363.70</u>	<u>3-6 months</u>	<u>Planning Commission advisory to City Council Final Authority and Hearing to City Council</u>
<u>Zoning Ordinance Amendment</u>	<u>\$6,080.08</u>	<u>3-6 months</u>	<u>Planning Commission advisory to City Council Final Authority and Hearing to City Council</u>
<u>Zoning Clearance Fee</u>	<u>\$446.87</u>	<u>2 weeks</u>	<u>Staff Level – Planning Department</u>
<u>Parcel Map</u>	<u>\$4,302.17</u>	<u>3-6 months</u>	<u>Planning Commission has the authority to approve/deny, final maps are to be approved by City Council</u>
<u>Tract Map</u>	<u>\$4,302.17</u>	<u>3-6 months</u>	<u>Planning Commission has the authority to approve/deny, final maps are to be approved by City Council</u>
<u>Lot Line Adjustment – Residential</u>	<u>\$2,878.27</u>	<u>2-4 months</u>	
<u>Plot Plan/Site Plan Review – Residential Major</u>	<u>\$4,479.73</u>	<u>2-4 months</u>	<u>Planning Department, Community Development has the authority to approve/deny</u> <u>Residential Development over 4 units require Planning Commission authority.</u>
<u>Plot Plan/Site Plan Review – Residential Minor</u>	<u>\$819.15</u>	<u>1-2 months</u>	<u>Planning Department, Community Development has the authority to approve/deny</u>

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<u>Conditional Use Permit</u>	<u>\$4,841.57</u>	<u>2-4 months</u>	<u>Planning Commission authority to approve/deny</u>
<u>Conditional Use permit Modification</u>	<u>\$2,844.91</u>	<u>2-4 months</u>	<u>Planning Commission authority to approve/deny</u> <u>*If Appealed City Council</u>
<u>Variance – Residential</u>	<u>\$2,850.51</u>	<u>2-4 months</u>	<u>Planning Commission authority to approve/deny</u> <u>*If appealed City Council</u>
<u>Environmental: EIR Review, Negative Declaration, or Mitigated Negative Declaration</u>	<u>At cost as determined by consultant</u>	<u>ND and MND: 3-6 months; EIR: 6-12 months</u>	
<u>Technology Cost</u>	<u>2% of total Planning fees to be collected</u>	<u>---</u>	<u>N/A</u>

<b>Application Type</b>	<b>Fee Per Application</b>	<b>Processing Timeline</b>
General Plan Amendment	\$6,363.70	6-12 months
Zone Change	\$6,363.70	3-6 months
Zoning Ordinance Amendment	\$6,080.08	3-6 months
Zoning Clearance Fee	\$446.87	2 weeks
Parcel Map	\$4,302.17	3-6 months
Traffic Map	\$4,302.17	3-6 months
Lot Line Adjustment – Residential	\$2,878.27	2-4 months
Plot Plan/Site Plan Review – Residential Major	\$4,479.73	2-4 months
Plot Plan/Site Plan Review – Residential Minor	\$819.15	1-2 months
Conditional Use Permit	\$4,841.57	2-4 months
Conditional Use permit Modification	\$2,844.91	2-4 months
Variance – Residential	\$2,850.51	2-4 months
Environmental: EIR Review, Negative Declaration, or Mitigated Negative Declaration	At cost as determined by consultant	ND and MND: 3-6 months; EIR: 6-12 months
Technology Cost	2% of total Planning fees to be collected	---

Source: City of Commerce Economic Development and Planning Department, 2023





**Table 3-9: Planning Fees for Commerce and Surrounding Cities Development Fees Per Residential Unit**

Application Type	Bell	Commerce	Downey	Maywood	Montebello	Pico Rivera
General Plan Amendment	\$1,182	\$6,363.70	\$7,350.00	\$1,644	\$3,408	Deposit based on hourly rates o all City staff involved
Zone Change	\$5,270	\$6,363.70	\$7,350	\$598	\$3,751	\$6,620
Parcel Map	\$1,050	\$4,302.17	\$4,900	\$2,012 (+ eng. Consultant cost)	\$4,883	\$4,790
Tract Map	\$1,050	\$4,302.17	\$6,126	\$2,012 (+ eng. Consultant cost)	\$4,883	\$6,905
Lot Line Adjustment – Residential	\$1,734	\$2,878.27	\$1,225	\$206 (+ eng. Consultant cost)	\$4,883	\$1,937.43
Plot Plan/Site Plan Review – Residential Major	\$2,000 (PC)	\$4,479.73	\$3,675	\$785	\$2442	---
Plot Plan/Site Plan Review – Residential Minor	---	\$819.15	\$613	\$23	\$2442	---
Conditional Use Permit	\$2,793	\$4,841.57	\$3,675	\$411	\$2,735 - \$5,000	\$3,880.01
Variance – Residential	\$675	\$2,850.51	\$3,920	\$411	\$2,735 - \$5,000	\$4,180

Source: Cities of Bell, Commerce, Downey, Maywood, Montebello and Pico Rivera websites, November 2023

**Table 3-10: Development Fees Per Residential Unit**

Permit Fees	Single Family Home*	Multi Family Development*
Plan Check Fee	\$3,837.33	\$2,569.38
Permit Fees	\$4,514.50	\$3,022.80
Plan Maintenance	\$73.77	\$49.39
S.M.I.P. residential	\$26.13	\$51.24
BSARF	\$9.00	\$7.43
Art Fee**	---	\$1,830.00
TOTAL	\$8,460.73	\$7,530.24

Source: City of Commerce 2023

\*Single Family Home: 1,200 square feet x \$167.37/square foot = \$200,844.00 project valuation

\*Multi Family Development: Rosewood Village Project at 5625 Jillson Ave); 3-story, 7-unit townhome project = \$1,281,000 project valuation/7 units = \$183,000 valuation per unit.

—————\*\*ART fee: 1% administrative fee added to any project with a building valuation greater than  
 —————\$250,000

## Development Review and Processing

The City of Commerce has fully implemented an expedited review process for building and construction plans through the establishment of a review committee. This committee consists of representatives from the Planning, Public Works, Engineering, and Fire Departments. The advantage of such a committee is that questions and/or problems that might surface at the Planning Commission meeting can be addressed prior to the meeting. The committee meets with the prospective applicant to discuss the project and to ascertain the nature of any issues that may arise in subsequent plan review. The effect of this review process is to provide valuable feedback to an applicant early in the planning process as a means to avoid potential delays and increased development costs related to a redesign of the development. No cost to the applicant is associated with these pre-consultation reviews. This process has expedited the Planning Commission's review of residential projects. Table 3-8 shows the average processing times for various planning projects. **The table also shows the decision-making body for different applications.**

Cases that do not involve any discretionary approvals (cases that do not require approval by the Planning Commission) may also be approved by the Review Committee. Such procedures speed up the approval process by several weeks. The Plan Check Review for new construction averages four to six weeks, which is considerably less than most surrounding cities. During the course of a development's design and planning, City staff is available to conduct pertinent reviews and issue permits related to engineering, drainage, grading, public works, electrical, and other aspects of new developments.

Residential infill projects are handled through the City's streamlined review and entitlement process. The entire development process from land clearance through construction typically takes between six months to one year to complete, depending on the number of units. This includes the time required for plan check and construction. Land clearance and site preparation will typically require two to four weeks to complete. Actual construction will take between twelve to 24 weeks, depending on the number of units. Tract map/parcel map review (by the County) typically requires three to six months if a soils report is not required. ~~When developments are subject to the CEQA review, a Class 32 exemption is generally provided to streamline the process.~~

### **On-Site and Off-Site Improvements**

The City requires developers to fulfill obligations specified in the Subdivision Map Act. Such improvements may include water, sewer, and other utility lines and extensions; street construction to City standards; and traffic control reasonably related to the project.

Commerce regulates the design, installation, and maintenance of improvements needed for new housing. On/off-site improvements include street right-of-way dedication, sidewalks, street lighting, curbs and gutters, water and sewer mains, and others.

The City's General Plan Transportation Element lists the following information about the City's roadway system and standards:

- Major Arterials (such as Washington Blvd): 84 feet of paving within a 100 -foot right-of way.
- Secondary Arterials (including Gage Avenue): 80-foot right-of-way with 64 feet of paving.
- Collector Streets: Commercial/industrial collectors have 44 feet of paving within a 60-foot right-of-way. Collectors in residential neighborhoods have 40 feet of paving within the same 60-foot right-of-way. Residents may park along the curb.
- Local Streets: 60 feet (with a curb-to-curb pavement width of 36 feet, two lanes, and on-street parking on both sides).

As stated in the General Plan Transportation Element,

“there are limited opportunities for roadway widening or the construction of new thoroughfares. Instead, new roadway improvements will be limited to intersection enhancements, and passive improvements, such as signalization synchronization.”<sup>3</sup>

The Modelo Specific Plan includes the layout for streets, sidewalks and other improvements in the Plan area due to the intensification of uses on site. The Rosewood Village Residential Development project included the following mitigation measures related to transportation and parking<sup>4</sup>:

- MM Traf-1: Prior to occupancy of the first building, the developer and City shall enter into a shared parking agreement that covers all three Project sites and the four parking zones notes.
- MM Traf-2: Prior to any lane closure or detour, the developer shall submit a Construction Traffic Management Plan for review and approval by the City Engineer.
- MM Traf-3: Prior to Occupancy of Site 1B and Site 2, approximately 376 feet of red-curb shall be painted along Jillson Street as the access point to the Project.

The City's improvement standards are similar to many other communities and do not constrain development or impact housing affordability.

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<sup>3</sup> City of Commerce General Plan, adopted January 2008, p. 56.

<sup>4</sup> City of Commerce, Rosewood Village Residential Project Mitigation Monitoring Program

## Non-Governmental Constraints

### Construction Costs

Construction costs have a significant impact on the cost of new housing. One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not account for regional differences nor include the price of the land upon which the building is built. Building Valuation Data, dated February 2021, reports the national average for development costs per square foot for apartments and single-family homes as follows<sup>5</sup>:

- Type I or II, R-2 Residential Multi-family: \$157.74 to \$179.04 per square foot
- Type V Wood Frame, R-2 Residential Multi-family: \$120.47 to \$125.18 per square foot
- Type V Wood Frame, R-3 Residential One- and Two-Family Dwelling: \$130.58 to \$138.79 per square foot
- R-4 Residential Care/Assisted Living Facilities generally range between \$152.25 to \$211.58 per square foot

Another factor related to construction costs is the number of units that can be developed at a single site which allows for reductions in building costs through economies of scale. This cost reduction is particularly beneficial when coupled with density bonuses which allow for more units than would be permitted according to the existing zoning. The density bonus serves as an incentive to the private developer to construct affordable housing. Pursuant to State law, the City of Commerce offers density bonus and other regulatory incentives to developers that include affordable housing within the development.

### Land Costs

Housing demand far exceeds the available housing units within the Southern California real estate market. Commerce is essentially built-out and there is very little vacant residential land available in the City. This is a significant constraint to the development of new housing within the City. The economy of land value and the cost of new construction can limit what a property owner can expect to achieve on an underdeveloped property.

An online survey of real estate sites in October 2022 did not find any vacant residential parcels for sale. Further, the Los Angeles Assessor's Property Search Tool also did not find any recent sales of vacant residential parcels in the city.

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<sup>5</sup><https://cdn-web.iccsafe.org/wp-content/uploads/BVD-BSJ-FEB21.pdf>

However, future housing construction in the City, if not on city-owned properties, is most likely to occur in mixed use areas where existing nonresidential properties are being redeveloped as residential or mixed use development. A search on loopnet.com showed some low-profile and old retail and office buildings available for sale. These properties are selling between \$200 to \$300 per square foot (of land area, including building structures on site). Many of these sites are being marketed for mixed use and multi-family development, assuming the retail and office buildings would be demolished. The Housing Opportunity Overlay zone and Modelo Specific Plan zone described earlier in this chapter provides options for residential development in the form of mixed-use and live/work housing. This will open up housing opportunities in areas that had previously been used for commercial, industrial or public facility uses.

### Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements, and refinancing, whether financed at market rate or with government assistance. ~~Table 3-11~~~~Table 3-10~~ summarizes the disposition of loan applications submitted to financial institutions in 2021. A total of 315 loan applications were submitted in 2021, with an overall approval rate of 62 percent and a denial rate of 14 percent. The highest approval rate (69 percent) was for conventional home purchase loans while the highest denial rate (50 percent) was for home improvement loans. Over a quarter (28 percent) of government-backed purchase loans were either withdrawn by the applicant or closed for incompleteness.

**Table 3-1140: Disposition of Home Loans (2021)**

Loan Type	Total Applications	Approved	Denied	Other
Conventional Purchase	51	68.6%	9.8%	21.6%
Government-Backed Purchase	18	61.1%	11.1%	27.8%
Refinance	242	60.7%	14.5%	24.8%
Home Improvement	4	50.0%	50.0%	0.0%
TOTAL	315	61.9%	14.0%	24.1%

Source: 2021 Home Mortgage Disclosure Data: <https://ffiec.cfbp.gov>

Note: "Approved" loans include loans originated and applications approved but not accepted. "Other" includes loans withdrawn by the applicant or closed for incompleteness.

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## Identified Densities and Approval Time

Requests to develop housing at densities below those anticipated in the Housing Element may be a non-governmental constraint to housing development, when the private sector prefers to develop at lower densities than shown in the housing element. Over the last housing cycle, no sites identified in the Housing Element were developed at a lower density than what was calculated in the Element.

Non-governmental constraints can also affect the timing between project approval and requests for building permits. This may be due to delays in securing construction financing, finding contractors, or changes in the housing market since project approval.

The entire development process from land clearance through construction typically takes between six months to one year to complete, depending on the number of units. This includes the time required for plan check and construction. Land clearance and site preparation will typically require two to four weeks to complete. Actual construction will take between twelve to 24 weeks, depending on the number of units.

## Environmental Constraints

### Seismic Hazards

As stated in the General Plan Safety Element, the entire City – as well as most of Southern California – is located within a seismically active region that has been subject to major earthquakes in the past. There are no known faults in Commerce. However, the Whittier fault is in close proximity to the City of Commerce. According to the Southern California Earthquake Data Center, the maximum probable earthquake that can be generated by the Whittier Fault is a magnitude 7.2. The greatest damage from earthquakes results from ground shaking. Although ground shaking is generally most severe near quake epicenter, property not immediately adjacent to the epicenter may be subject to extreme damage due to liquefaction. The greatest potential danger is the collapse of older residential units constructed from unreinforced masonry, and explosions of petroleum and fuel lines.

### Flooding

The Federal Emergency Management Agency (FEMA) publishes maps that identify areas of the City subject to flooding in the event of a major storm. These Flood Insurance Rate Maps (FIRMs) indicate areas that may be inundated in the event of a 100-year or a 500-year storm. In addition, the maps indicate the base flood elevations at selected intervals of the floodway. Commerce lies within the dam inundation area of the Garvey Reservoir in Monterey Park. Dam rupture could result in the flooding of areas between Eastern Avenue and Garfield Avenue. The Ferguson neighborhood and portions of the Rosewood neighborhood could be affected by the flooding. Areas that are designated for future

residential development do not fall within the 100-year floodplain and are not subject to specialized flood construction requirements.

### **Fire Hazards**

The most serious fire threat within the City is building and structure fires. Since Commerce is built out, and located within central Los Angeles County, it does not have the same risk of fires from accumulated brush and vegetation that cities on the urban fringe experience. Other fire hazards within the City may be associated with heavy industrial uses, older commercial and residential structures, the presence of hazardous materials, and arson.

### **Noise**

Residential land uses are sensitive to loud noises. State noise guidelines recommend that residential development be located in areas exposed to ambient outdoor noise levels no greater than 65 A-weighted decibels (dBA). A citywide noise inventory performed in October 2005 found that virtually all of the neighborhoods in Commerce are located in areas where noise levels exceed 65 dBA. The City's noise environment is not expected to significantly change over time since the primary factors contributing to noise, the I-5 and I-710 Freeways, the railway freight lines, the railroad yard, and local truck traffic, will have a continued presence in the City.

The General Plan FEIR identifies Community Development and Health and Safety policies that are designed to protect sensitive uses (such as housing) from excessive noise impacts. First, noise sensitive land uses are generally prohibited from being sited in areas characterized by high ambient noise levels. Second, land uses that generate excessive noise levels may not be permitted near sensitive land uses. Finally, the General Plan promotes measures that will reduce noise exposure through the use of site planning and construction techniques. These policies are implemented by the City through its standard environmental review process that requires preparation of noise impact studies, as necessary.

All new residential development will need to meet General Plan Noise Element and State guidelines for exterior and interior ambient noise levels. Compliance with these guidelines may require more expensive construction techniques, which may in turn increase housing costs.

### **Air Quality**

Given the composition of land uses in the City, the 2020 General Plan establishes a set of strategies to enable industrial activities and businesses to coexist with residential uses. Specifically, a major consideration in land use decisions is an evaluation of how stationary emissions from these businesses can be mitigated so they do not impact sensitive



receptors. In addition to emissions generated by local businesses the City also experiences high volumes of truck traffic and railways running through the City to accommodate goods movement. Both rail and truck traffic can generate significant amounts of particulate matter which contribute to a less than ideal environment for residential uses. Furthermore, the City of Commerce is also bisected by two freeways: Interstate 5 which runs generally in an east-west orientation and Interstate 710 which runs north-south. It is not recommended that housing be located within 500 feet of freeways to avoid long term exposure to particulate matter for long term residents. Generally, the City is aware of potential air quality impacts on future residential development and has been careful to identify opportunity areas for residential development that are less impacted than other areas of the City. It is important to understand the existing environment and conditions present in the City with regard to housing, as the options for safe and healthy sites within the City are limited based on the industrial activity established in the City.

### **Hazardous Materials**

As the City of Commerce is primarily made up of industrial uses, it is important to ensure that sites that are identified and developed with housing are appropriate and safe. According to the California Department of Toxic Substance Control, in 2013, no parcels within the Housing Opportunity Overlay were identified on the Hazardous Waste and Substances Site List or the State Water Resources Control Board (SWRCB) list of cleanup sites. Despite this, future housing development or redevelopment will be reviewed on a project-by-project basis as part of the City's standard environmental review process to determine, if any, site contamination and the degree of remediation required. This is consistent with the policies of the General Plan Safety Element and the findings of the General Plan FEIR. It is possible that additional analysis may be required, including a soils analysis, to ensure that sites are safe for residential development, which can add cost and time to the development process. The City of Commerce will work with developers to streamline the process and provide funding, when possible.

## CHAPTER 4: HOUSING RESOURCES

This section describes and analyzes the resources available for development, rehabilitation and preservation of housing in Commerce. This includes the availability of land resources and the ability to satisfy the City's share of the regional housing need, and financial resources available to support the provision of affordable housing. Financial resources for housing activities and energy conservation resources to reduce utility costs are also included in this chapter.

### Regional Housing Needs Assessment (RHNA)

The Regional Housing Needs Allocation (RHNA) is a critical part of State housing element law (Government Code Section 65580). The process for determining the RHNA is briefly described below:

- The State Department of Housing and Community Development (HCD) uses the California Department of Finance (DOF) growth projection and other factors to determine the number of housing units that are needed statewide over an eight-year planning period (for Commerce and other Southern California jurisdictions, this time period is years 2021-2029).
- This statewide housing unit number (called the Regional Housing Needs Determination, or RHND), is divided into regions. Commerce is located within the Southern California Association of Government (SCAG) region.
- SCAG is responsible for creating a methodology to distribute the RHND among all of its cities and counties. Each jurisdiction's housing unit number is called the Regional Housing Needs Allocation (RHNA).
- The RHNA is the number of units that a jurisdiction must plan for in the Housing Element update. The units are divided into four different categories based on median income: very low (earn  $\leq 50$  percent of the area median income, or AMI), low (earn between 51 and 80 percent of AMI), moderate (earn between 81 and 120 percent of AMI) and above moderate (earn more than 120 percent of AMI).
- Almost all jurisdictions in the SCAG region received a significantly larger RHNA this cycle compared to the last housing element cycle, primarily due to changes in state law that led to a considerably higher RHND compared to previous cycles.

## RHNA for Commerce

For the 2021-2029 Housing Element, the City of Commerce has been assigned a RHNA of 247 new units by SCAG. To ensure the City meets this minimum, a 15 to 30 percent buffer is recommended by HCD to account for the “No Net Loss” requirement as mandated by SB 166. Pursuant to SB 166, while the RHNA is not a production obligation, but if sites are not developed at the density or income level identified in the Housing.

This allocation is distributed into four income categories, as shown below in Table 4-1. The RHNA includes an equity adjustment which allocates future (construction) need by each income category in a way that meets the State mandate to reduce the over-concentration of lower income households in one community. For Commerce, because the City has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy.

**Table 4-1: Housing Needs for 2021-2029**

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low/Very Low (50% or less)*	55	22.3%
Low (51 to 80%)	22	8.9%
Moderate (81 to 210%)	39	15.8%
Above Moderate (Over 120%)	131	53.0%
Total	247	100.0%

*\*The City has a RHNA allocation of 55 very low income units (inclusive of extremely low income units). While the RHNA did not separately define housing needs for extremely low income households, the very low income allocation can be split evenly between very low- and extremely low income households.*

*Source: SCAG 6<sup>th</sup> Cycle Final RHNA Allocation Plan, 7/1/2021*

## Development Credit and Remaining Need

While the Housing Element covers an eight-year planning period, starting on October 15, 2021, and ending on October 15, 2029, the RHNA projection period began on June 30, 2021. Therefore, projects that are under construction (but not yet finalized), have received entitlement, been approved, under review, or with pending applications as of June 30, 2021 can be credited as progress toward the RHNA. Table 4-2 summarizes Commerce’s credits and the remaining housing need through October 15, 2029.

**Table 4-2: RHNA Credits and Remaining Need**

Income Category (% of County AMI)	RHNA	Potential ADUs	Bldg Permit Issued	Entitled	Remaining Need
Extremely Low (50% or less)	28	2	0	0	26
Very Low (31-50% AMI)	27	1	0	0	26
Low (51 to 80%)	22	7	0	0	15
Moderate (81 to 210%)	39	1	0	0	38
Above Moderate (Over 120%)	131	5	31	102	0
Total	247	16	31	102	105

### Projected Accessory Dwelling Units (ADUs)

Pursuant to State law, the City may credit potential ADUs to the RHNA requirements by using the trends in ADU construction to estimate new production. The City switched building permits systems in 2020 and is unable to recover records from the previous system. The City issued five building permits for ADUs in 2021 and two in 2022. Based on this data, the City conservatively assumes two ADUs annually in the eight-year planning period for a total of 16 ADUs. SCAG conducted a regional analysis of existing ADU rents in April and June 2020. The analysis broke down Los Angeles County into two survey areas. The city of Commerce is located within in the LA County II study area. The analysis resulted in affordability assumptions for jurisdictions in this study area, that allocated 15 percent to extremely low income, 8.5 percent to very low income, 44.6 percent, to low-income households, 2.1 percent to moderate-income, and 29.8 percent to above-moderate income households. Based on the ADU rent survey conducted by SCAG, of the 16 ADUs projected to be built, two units will be for extremely low income households, one unit for very low income households, seven for low income households, one for moderate income households and five units for above moderate income households.

### Entitled Projects

In October 2020, the Commerce City Council approved the Rosewood Village project. A three-parcel project developed with various commercial and industrial uses. The sites are located in the Rosewood Village neighborhood, adjacent to City Hall. In April 2021, 31 permits were issued for Site 1B, located at 5625 Jillson Street (Jillson Street and Valentina Way). These 31 attached townhomes are located near the Rosewood Park and Library. Site 1B is an asymmetrical-shaped lot approximately 1.33-acre in size. The site is flat and currently developed with a one and one-half story, 19,629-square-foot, light industrial,

warehouse and attached office building constructed in 1949 and associated asphalt parking area, which is also used as a transitional storage area for miscellaneous household debris, and known as the Provisor Building. Three of the units will be reserved for workforce housing for middle income households (up to 175 percent AMI).

The other two sites of the Rosewood Village project are currently being processed. Site 1A (5550 Harbor Boulevard) has gone through plan check and is awaiting issuance of building permits. This site is approximately 1.98-acre in size and is currently developed with a one and one-half story, 27,376-square-foot office building built in 1956, known as the North Annex along with an asphalt parking lot associated with the Aquatic Center. Plan check has been completed for 37 attached single-family units. Three of these units will be reserved for workforce housing for middle income households (175 percent AMI).

Site 2 (5555 Jillson Avenue) is a 2.43-acre lot developed with the City of Commerce Transportation Center office building, vehicle maintenance bays and a two-story parking structure with a ramp built in 1997. A total of 65 attached single-family units will be built on this site, with three of these units being reserved for workforce housing for middle income households (up to 175 percent AMI). This project is in the process of remediation for site contamination issues. The developer is working with the Department of Toxic Substances Control. The project -and-but is expected to submit for plan check review within one year by the end of 2024..

Overall, the development agreement for Rosewood Village commits to providing nine workforce housing units for middle income households. The City plans to use city funds to assist with downpayment assistance for income qualified households. This assistance for Rosewood Village was offered as part of the City's First-Time Homebuyer Program 2.0 for households that earned 175% of the Area Median Income This equated to \$98,000 for a one-person household up to \$184,800 for an eight-person household as of 2023. The application process and information was advertised on the City website. However, because income level can exceed 120 percent AMI, these units are credited against the RHNA for above moderate income. A program has been included in this Element to monitor the progress of the remaining units.

### Remaining RHNA

After accounting for ADUs and entitled projects, and project under review, the remaining need is 99 units. HCD also recommends that jurisdictions identify enough residential capacity within their boundaries that is above and beyond the required housing numbers identified in lower income categories, to help offset sites that may (or may not) be developed during the planning period. Based on HCD guidance and review of other Housing Elements, a “buffer” or margin of safety of at least 15 percent above the City’s

remaining RHNA allocation for the lower and moderate-income categories.<sup>1</sup> The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029. To accomplish this, the Residential Sites Inventory was developed and is described in further detail in the following section.

## Residential Sites Inventory

Housing Element law requires Housing Elements to include a detailed land inventory and analysis of properties to identify sites that can be developed for housing within the planning period, noting zoning and general plan designations, size and existing uses; general analysis of environmental constraints and the availability of infrastructure, and the evaluation of the suitability, availability and realistic development capacity of sites. The following sections provide detail about Commerce’s Residential Sites Inventory.

### Realistic Capacity and Units by Income Category

State law requires that a city project realistic estimates for housing capacity on its RHNA sites. Realistic capacity may be estimated by utilizing recent project history, using a minimum density, or through other methods. –It is important to note that the capacity analysis is a planning exercise and does not mandate the elimination of existing use(s) or building(s) on a property unless the property owner so chooses. Instead, this analysis demonstrates that the City’s zoning and land use as applied to specific sites is adequate to accommodate possible units on specific sites. This “capacity analysis” is a strategy that looks at the community as it is today, applies the existing development rules, and calculates the resultant number of housing units that could reasonably and realistically be provided. The capacity analysis also considers the feasibility of redeveloping existing uses on site. For example, whether those uses are in decline, the site is underutilized compared to allowable intensity, and/or exhibiting trend of recycling to higher and better uses compared to other similar uses in the region.

Table 4-3 shows assumed densities, yields and affordability used for the site inventory based on the proposed General Plan Update and recent development in Commerce and surrounding areas. For density assumptions in the site inventory, the proposed density ranges in the General Plan Update (Land Use Element) were considered. The proposed R2 land use designation will change from 0 to 17 du/ac to 11.1 to 17 du/ac and the R3 land use designation will change from 0 to 27 du/ac to 17.1 to 27 du/ac. Given these alterations, the lower range of these ranges were assumed: 12 du/ac in the medium

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<sup>1</sup> No Net Loss requires cities to demonstrate that capacity is available for affordable units throughout the 8-year planning period, including when a proposed development on a specific site result in fewer units than were assumed to be possible on that site in the Housing Element Sites Inventory (Government Code Section 65863, “No Net Loss” requirements).

density residential zone and 20 du/ac in the high density residential zone. The proposed densities for the General Plan Update new land use categories are 40 to 80 du/ac. Based on recent projects, a conservative assumption of 50 du/ac for mixed use zones was applied. These density assumptions are conservative, based on the low-end of the density ranges. While the City of Commerce has not had any mixed use projects, the General Plan Update new land use categories supports this type of development and recent projects in the surrounding jurisdictions shows that this type of housing is supported in the area.

Table C-1 in Appendix C shows recent projects in Commerce and the surrounding areas. Existing uses on these sites included lower density residential, vacant commercial buildings and parking lots. These uses are similar to criteria that was used to choose Commerce’s sixth-cycle sites (as described later in this Chapter and Appendix C). Below is a summary of the types of uses and densities:

- Residential Projects
  - Commerce: three phases of attached single-family homes (Rosewood Village): 18.6 to 26.7 du/ac.
  - Bell Gardens, Montebello and Downey: Condos and Apartments: Density range from 14.8 to 51 du/ac
- Mixed Use Projects
  - Montebello: 23.5 to 84.6 du/ac

**Table 4-3: Assumed Densities and Affordability Levels Used in Site Inventory**

<u>Zone</u>	<u>Maximum Density (du/ac)</u>	<u>Yield</u>	<u>Estimated Yield</u>	<u>Income Level for City-Owned Sites</u>	<u>Income Level for Non-City-Owned Sites</u>
<u>Modelo Specific Plan</u>	<u>87*</u>	<u>100%*</u>	<u>87 du/ac</u>	<u>---</u>	<u>10% units reserved for workforce housing (175% AMI)</u>
<u>R2</u>	<u>17</u>	<u>70%</u>	<u>12 du/ac</u>	<u>Moderate</u>	<u>Above moderate</u>
<u>R3</u>	<u>27</u>	<u>74%</u>	<u>20 du/ac</u>	<u>Very low and low</u>	<u>---</u>
<u>Mixed Use – Washington 1**</u>	<u>85</u>	<u>59%</u>	<u>50 du/ca</u>	<u>Very low, low, moderate and above moderate</u>	<u>Above moderate</u>



<u>Mixed Use – Atlantic**</u>	<u>85</u>	<u>59%</u>	<u>50 du/ac</u>	<u>Very low, low, moderate and above moderate</u>	<u>Above moderate</u>
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### **Estimating Potential Units by Income Category**

“Default density” is a feature of state law and is a very important component of the methodology for the capacity analysis. The RHNA is divided into different income levels, as a jurisdiction needs to show its intent to provide housing for households of various income levels (SCAG determines the calculation methodology and number of units per income category). To assess this from a planning perspective, a “default density” is assigned to determine the number of units that could be counted in individual income categories. Generally speaking, the higher the potential density of a site, the more affordable the resultant development will be and the lower the income level it will be assigned to. Default density is therefore used for the purpose of assessing whether a jurisdiction can meet its RHNA, but actual development circumstances may vary. For the affordability break down, assumptions included 50 percent lower income, 25 percent moderate income and 25 percent above moderate income for sites that are city-owned. The City will diligently pursue affordable housing opportunities on City-owned sites, including adherence to the requirements of Surplus Land Act.

### **Methodology for Identifying Sites**

The City assessed a number of sites that would be realistic candidates for infill residential development to fulfill the RHNA. To ensure a meaningful analysis, a list of criteria was developed to identify only properties that had realistic development potential. A review was conducted on the City’s parcels, including environmental constraints (such as pollution), potential residential displacement and the City’s existing land use, zoning, and development standards. Key considerations were current ownership (i.e. City-owned properties), current uses and condition of site and proposed General Plan Land Use Designations. See Appendix C for the list of criteria and details for identified sites. In addition, information obtained during the General Plan Update public outreach process was considered. Key take aways included (Please see Section 1 and Appendix A of this Element for additional public outreach information:

- Commerce is behind in residential development
- Northwest and Bristow areas were identified as locations to have additional residential uses over time
- Denser residential development is a priority to provide different housing options
- Housing for young adults wanting to move back to Commerce is needed



- Investigate sites for housing in the Veterans Park area for housing
- Need to provide housing for the local workforce

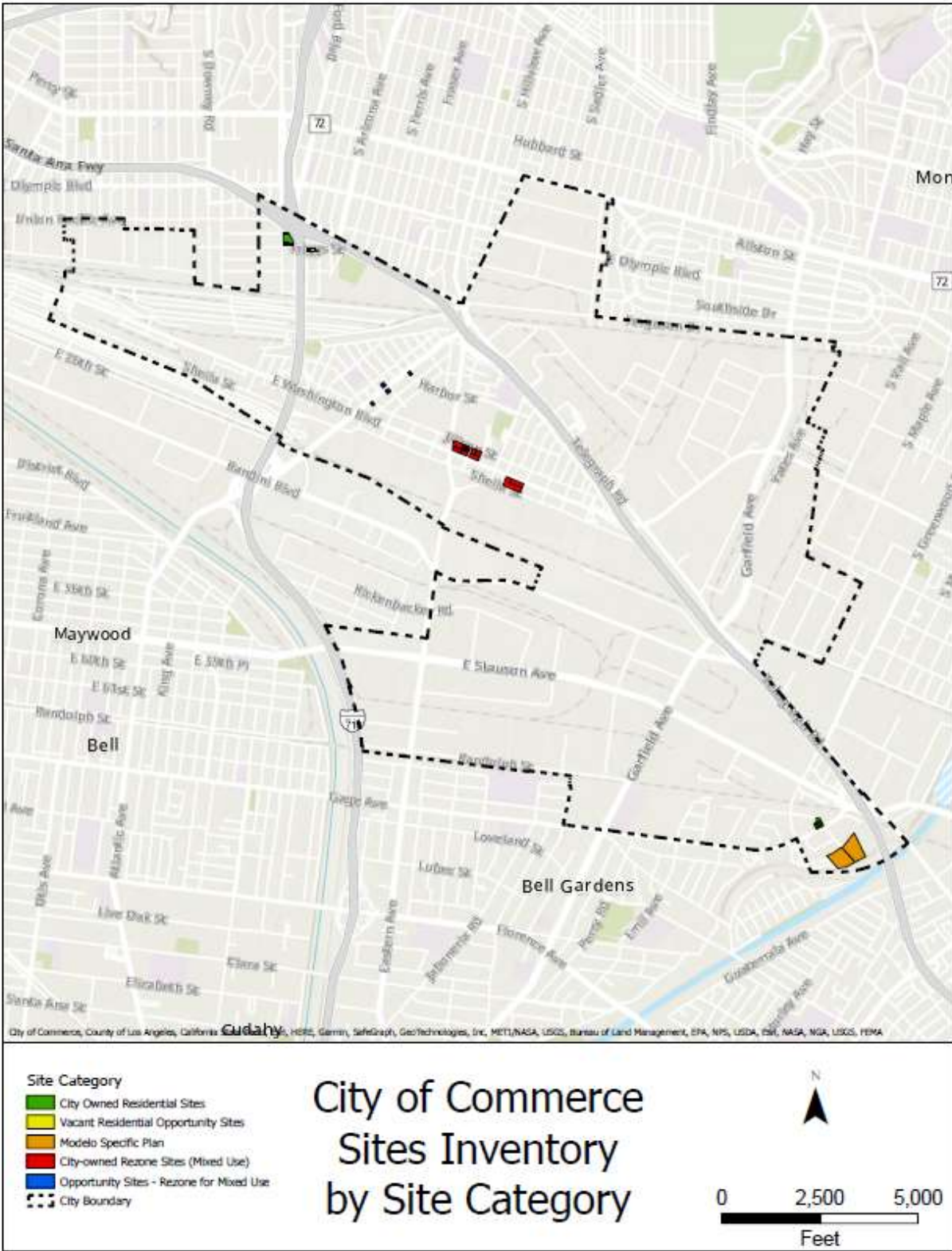
### **Five Components of Commerce's Site Inventory**

The 6<sup>th</sup> Cycle Sites Inventory for Commerce is made up to five types of sites:

- The approved Modelo Specific Plan;
- City-Owned Properties:
  - Vacant sites in existing residential zones
  - Underutilized sites in proposed mixed use rezone areas
- Non-City-Owned Properties
  - Vacant opportunity sites in existing residential zones;
  - Underutilized opportunity sites in proposed mixed use rezone areas

Appendix C of the Housing Element includes information about each site. A brief summary of the five sites inventory categories is included below. Figure 4-1 shows Commerce's Site Inventory by category.

Figure 4-1: Commerce Sites Inventory



## Modelo Specific Plan

The Modelo Specific Plan, approved by the City Council in February 2022, outlines the redevelopment of the existing Veterans Memorial Park located at 6364 Zindell Avenue, and an adjacent vacant parcel at 7316 E. Gage Avenue (collectively, the “Project Site”). The parcel located at 7316 Gage Avenue is planned to have entertainment, retail and community spaces due to its proximity to the freeway. Under the Specific Plan, the remaining 9.72 acres of the Project Site will include the construction of up to 850 residential units. These residential units will be on the central and western portions of the Specific Plan area. The development agreement commits the project to provide 10 percent (85 units) in the Specific Plan as workforce housing, affordable to middle income households (up to 175 percent AMI). For the purpose of RHNA credits, all 850 units are assigned to above moderate income level. ~~Table 4-4~~ **Table 4-3** shows the approximate income breakdown for the residential units. All 850 units can be developed with the eight-year time frame of the Housing Element.

**Table 4-43: Modelo Specific Plan Residential Units**

Parcel Size and Estimated Density (du/acre)*	Extremely Low/Very Low Income	Low Income	Moderate Income	Above Moderate Income**	Total Units***
9.72 acres 87.5 du/acre	0	0	0	850	850

*Note: \*The 9.72 acres accounts for the project site with proposed residential units.*

*\*\*10% (85 units) in the Specific Plan will be workforce housing, affordable to middle income households (175% of AMI).*

*The 850 total residential units were approved as part of the Modelo Specific Plan by the Commerce City Council in February 2022.*

## City-Owned Properties

### Vacant Sites in Existing Residential Zones

The City owns nine (9) vacant residential parcels in Commerce that have been identified for future housing opportunities. Five contiguous parcels, ranging in size from 0.11 acre to 1.08 acres, are located on Eastern Avenue and Triggs Street in the northern portion of the city adjacent to the 710 freeway. Due to the R2 zoning and associated maximum density of 17 dwelling units to the acre (du/ac), these parcels are calculated at 12 du/ac (70 percent of the maximum density). Since they are city-owned, the 17 potential units from these sites are applied to Commerce’s moderate income RHNA. These five parcels were classified as surplus land in December 2020. The City Council resolution also permitted the City to commence negotiations for the disposal of these properties.

The second group of contiguous vacant City-owned residential parcels are located on Gage Avenue near Zindell Avenue in the southern corner of Commerce. Currently zoned high density, these parcels total 0.90 acre. Calculated at 20 du/ac (maximum allowable density is 27 du/ac), these sites yield a potential of 12 units. Since these sites are City-owned, the units are allocated to Commerce's very low (6 units) and low (six units) income RHNA.

This Housing Element includes a program to adhere to the Surplus Land Act when disposing of these City-owned parcels.

### ***Underutilized Sites in Proposed Mixed Use Rezone Areas***

The City is currently updating its General Plan. In order to facilitate additional residential development, two new mixed use designations will be created and the current Atlantic Mixed Use category will be renamed Mixed Use Atlantic. The proposed land use densities for these mixed use designations ranges from 40 to 85 du/ac. All of the sites with these mixed use General Plan designations are located in the Commercial Manufacturing (C/M1) zone. Due to this designation, the sites will need to be rezoned in order to accommodate residential development.

A total of 16 City-owned parcels are included in this sites inventory that will be located in the proposed Mixed Use Atlantic and Mixed Use Washington 1 land use designations. These parcels are located along the Atlantic and Washington Boulevard corridors between the 5 and 710 freeways and range in size from 0.07 to 1.72 acres. As shown in Appendix C, these parcels can be consolidated to create three larger sites. Due to the proposed mixed use zoning, units on these sites were calculated at 50 du/ac for a total of 300 and are allocated as follows toward the RHNA: 73 very low, 70 low, 79 moderate and 78 above moderate income. The suitability of redeveloping these sites is discussed later in this chapter.

This Housing Element includes a program to adhere to the Surplus Land Act when disposing of these City-owned parcels.

## **Non-City-Owned Properties**

### ***Vacant Opportunity Sites in Existing Residential Zones***

Four vacant parcels located near Duncan Avenue, Triggs Street and McBride Avenue are currently zoned for medium density residential and have a range of 0-17 du/acre. The five potential units on these parcels are calculated at 12 du/ac (70 percent of maximum) and can be used for above-moderate income housing units.

### ***Underutilized Opportunity Sites in Proposed Mixed Use Rezone Areas***

The Rosewood Village project demonstrates the trend of converting discontinued or obsolete commercial and industrial uses into residential development in Commerce. The

Housing Opportunity Overlay (HOO) capitalizes on this trend to provide additional opportunities for affordable housing.

The City currently has one mixed-use General Plan designation: Atlantic Mixed Use. This designation will be changed to Mixed-Use Atlantic as part of the General Plan update and will include a higher density range (40 to 85 du/ac). The site inventory has ten parcels that are currently designated Atlantic Mixed Use in General Plan. All of the sites are currently zoned Commercial Manufacturing (C/M1) zone. Due to this designation, the sites will need to be rezoned in order to be consistent with its General Plan designation and to accommodate residential development. However, this rezoning is not needed to meet the City's RHNA for above moderate income households.

Appendix C shows that several of the ten parcels are under the same ownership and can be consolidated into four larger sites. Using a density of 50 du/ac (59 percent of maximum density), these parcels can provide 34 units, primarily affordable to above moderate income households.

## Site Suitability

### Suitability of Nonvacant Sites

The housing element must analyze the extent to which existing uses may impede additional residential development. The inclusion of nonvacant parcels in the sites inventory allow for mixed-use development along Commerce's corridors and allows for new residential uses to be geographically distributed throughout the city. All the nonvacant sites identified include parking lots (these must be identified as nonvacant by the California Department of Housing and Community Development), marginal uses such as underused commercial uses and marginal operations. Following is a brief description of the nonvacant sites:

### City-Owned Nonvacant Sites

Of the 16 nonvacant sites that are owned by the City, 13 of them are parking lots. These parking lots can be combined and consolidated with the parcels described below. The Rosewood Village project included three phases of residential development that were built/are planned on sites with prior commercial, warehouse and light industrial uses. The approved Modelo Specific Plan includes a proposed mix of uses including residential and commercial. Table C-1 in Appendix C show a variety of mixed use projects in neighboring jurisdictions (Montebello, Downey) that were developed on parking lots or reused parcels. While Commerce has not had much of this type of development due to density limitations, the proposed General Plan Land Use designations will permit higher densities, encouraging types of development that the market has shown viable in nearby cities.



The parcel located at 5555 Washington Boulevard has a Jack-in-the-Box fast food restaurant which was built in 1986 and is approximately 37 years old. The site also has a low FAR (0.13) and improvement to land ratio (0.449). This parcel can be consolidated with nine of adjoining parking lot parcels for a larger 2.2-acre site ([Site G in site inventory](#)). [The Jack n the Box is currently on a month-to-month lease. The lessee is seeking potential sites for relocating. Once relocation is complete, the building will be demolished. Redevelopment of the site does not necessarily require the removal of this use but can be incorporated into the overall redevelopment.](#)

A parcel at 5733 Sheila Blvd and an adjoining parking lot parcel mentioned above currently have an operational commercial transportation company. The building was built in 1968, making it over 50 years old and has a low FARs (0.099). These two parcels can be consolidated and make a 2.61-acre site ([Site E in Site Inventory](#)). [The lease for the commercial transportation company is on a month-to-month basis.](#)

The City's corporation and maintenance yard is currently located at 5611 Washington Boulevard and three adjoining parking lot/storage parcels. The building was constructed in 1966, making it more than 55 years old. [The City of Commerce's new Transportation Facility is undergoing rezoning for the potential relocation site. Currently the conceptual plan is at 60 percent and undergoing review. The City is currently seeking other forms of funding and pursuing grant funding. At the time of this Housing Element, no known barriers to development are present on the site. However, an environmental review will be conducted at the time of a proposed project which will determine if any environmental remediation will need to be completed.](#) [The City is currently in the process of relocating the Corporation yard and maintenance facilities.](#)

The City reviewed all city-owned properties and identified these for residential development. As mentioned earlier, a program has been included in this Housing Element to pursue redevelopment of these sites. [The City is currently coordinating with potential developers to develop these and adjacent \(non-city owned\) parcels. A program in the Housing Resources chapter addresses a mid-cycle check in on these properties to determine likelihood of development and additional steps, if needed, to meet the RHNA.](#)

### **Non-City-Owned Nonvacant Sites**

Similar to the City-owned nonvacant sites, the underutilized opportunity sites are mainly parking lots. Of the 11 parcels, only one has a structure built on the site. This is a storage/office building located at 2210 Atlantic Boulevard. The structure was built in 1953, has a low FAR of 0.08 and an improvement to land ratio of 0.52. [The site is classified as a utility use by the Los Angeles Assessor's Office. Pictures of the site are included in Appendix C, Sites Inventory.](#) Furthermore, none of these parcels are identified for lower income use and are not needed to meet the City's RHNA. [A program in the Housing](#)

Resources chapter addresses a mid-cycle check in on these properties to determine likelihood of development and additional steps, if needed, to meet the RHNA.

### **Likelihood of 100 Percent Nonresidential Development**

Sites in the proposed mixed use rezone areas are located in either the proposed Mixed Use Washington 1 zone or the Mixed Use Atlantic zone. Both of these proposed zones include multi-unit attached residential housing, live/work units, office and retail uses. The MU Washington 1 zone is also proposed to allow breweries, wineries and distilleries. As mentioned earlier in this section, the proposed zones will permit higher densities than currently permitted in the City; thereby encouraging types of development that have not been done in Commerce before.

At this time, proposed Zoning Code revisions do not include a requirement for residential to be a component on all project sites. There has been no complete redevelopment of commercial sites in these mixed use areas in recent years. Furthermore, based on the development trends in Commerce and the region, there is limited interest in 100 percent commercial/retail development. Demand for retail and office uses has declined, due to remote working and online shopping. In the last ten years, no nonresidential projects, or projects with a residential component, have been built in the proposed mixed use zones.

The Rosewood Village project included three phases of residential development that were built on sites with prior commercial, warehouse and light industrial uses. The Modelo Specific Plan proposes 850 residential units on property that was previously used for non-residential uses. These recent projects and approvals shows the demand for housing that exists in Commerce and the likelihood that future projects in mixed-use areas of the City will include a residential component.

### **Small Lot Development**

While the non-city-owned sites can be consolidated due to parcel location and same ownership, the proposed sites will still be under ½ acre in size. Due to this size limitation, the proposed units on these sites are designated for above-moderate income and are not being used to meet the City's RHNA allocation.

## **Summary of RHNA Strategies**

Overall, the City is able to accommodate its RHNA, with a 52 percent buffer for the remaining very low income RHNA, a 407 percent buffer for the remaining low income RHNA and a 153 percent buffer for the remaining moderate income RHNA (Table 4-5/4-4). Figure 4-2 shows the City's site inventory by income category.

**Table 4-54: Summary of RHNA Strategies**

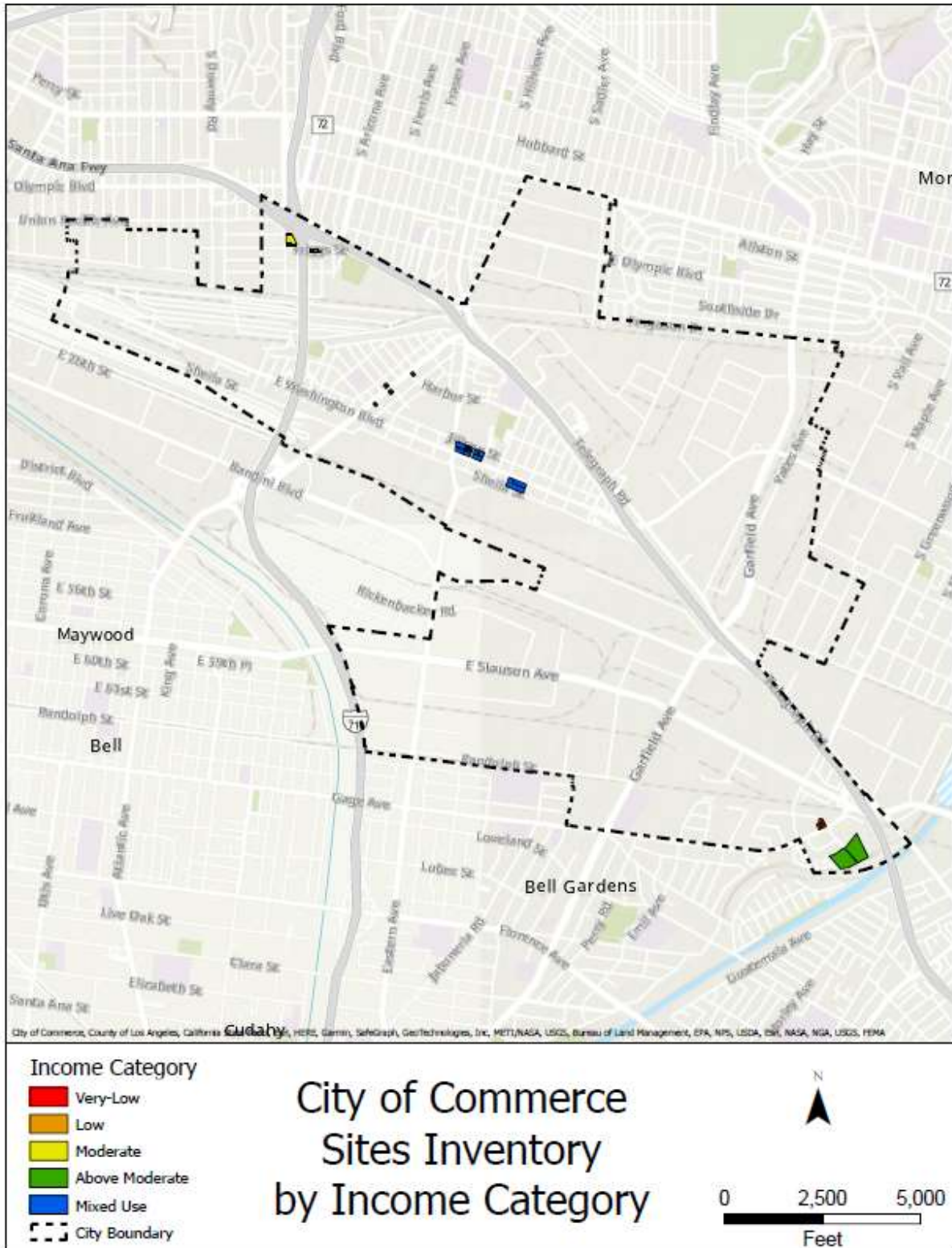
	Extremely Low/Very Low	Low	Moderate	Above Moderate	Total
<b>RHNA</b>	55	22	39	131	247
Potential ADUs*	3	7	1	5	16
Building Permits Issued (Site 1B of Rosewood Village)	0	0	0	31	31
Entitled (Site 1A and Site 2)	0	0	0	102	102
Total Credits	3	7	1	138	149
<b>Remaining RHNA Need</b>	52	15	38	0	105
Modelo Specific Plan	0	0	0	850	850
City-Owned Properties					
Vacant Residential Sites	6	6	17	0	29
Underutilized Mixed Use Rezone Sites	73	70	79	78	300
Non-City-Owned Properties					
Vacant Residential Opportunity Sites	0	0	0	5	5
Underutilized Opportunity Mixed Use Rezone Sites	0	0	0	34	34
<b>Total Units to Meet Remaining RHNA Need</b>	79	76	96	967	1,218
Surplus	27	61	58	967	1,113
% Buffer over Remaining Lower Income RHNA	52%	407%	153%	N/A	

Note: \*ADUs distributed according to the SCAG region recommended income distribution

\*\*Lower income units distributed proportionately between very low and low income based on RHNA allocation



Figure 4-2: Commerce Site Inventory By Income Category



## Availability of Infrastructure and Services

As a completely urbanized community, the City of Commerce has already in place all of the necessary infrastructure to support future development. All land designated for residential use is served by sewer and water lines, streets, storm drains, and telephone, electrical, and gas lines. However, improvements and expansions may be necessary to accommodate the intensification of land use. The Modelo Specific Plan and EIR addresses the infrastructure needed for the residential development in the plan area.

SB 1087, effective January 2006, requires water and sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower income households. Pursuant to these statutes, upon adoption of its Housing Element, Commerce will immediately deliver the Element to local water and sewer providers, along with a summary of its regional housing needs allocation.

## Environmental Conditions for Sites

As discussed in the Constraints chapter of this Element, the City faces several environmental constraints, including: seismic hazards, flooding, fire hazards, noise, air quality and hazardous materials. None of the sites are constrained due to lot shape, access, overlays, or easements. Regarding contamination and noise, due to the history of Commerce's development as an industrial city, options for safe and healthy sites within the City are limited. As shown in Appendix C, the entire city has the highest (worst) scores for pollution and other environmental hazard exposures.. All of Commerce is considered a disadvantaged community according to the CalEnviroScreen 4.0 scores.

The inventory of sites does not put any proposed location at a greater or less disadvantage than others. The City is currently developing an Environmental Justice Element as part of the General Plan. With the gradual recycling of obsolete/discontinued industrial properties into residential and mixed use developments, the City facilitates the remediation of environmental hazards on some of these properties.

## Financial Resources

There are a variety of potential funding sources available for housing activities in Commerce. Due to both the high cost of developing and preserving housing, and limitations on both the amount and uses of funds, a variety of funding sources may be required. Table 4-6~~Table 4-5~~ lists the potential funding sources that are available for housing activities. They are divided into five categories including: Federal, State, county, local and private resources.

**Table 4-65: Financial Resources Available for Housing Activities**

Program Name	Description	Eligible Activities
1. Federal Programs and Funding Sources		
Community Development Block Grant (CDBG) (Administered by LACDA)	The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. The City receives CDBG funds from the County of Los Angeles.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Home Investment Partnership (HOME) (Administered by LACDA)	Commerce or nonprofits proposing to development affordable housing can apply to receive HOME funds through the County of Los Angeles. HOME funds are used to assist low income (80% AMI) households.	New Construction Acquisition Rehabilitation Homebuyer Assistance Rental Assistance
Mortgage Credit Certificate	Federal income tax credits (15% mortgage interest) available to low income first-time homebuyers to purchase housing in Commerce. The County makes certificates available through participating lenders.	Home Buyer Assistance
2. State Programs		
Low-income Housing Tax Credit (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sale are typically used to create housing. Tax credits are available between 4% and 9%.	New Construction
SB 2/LEAP Grants	SB 2 funds are available as planning grants to local jurisdictions to increase the supply of affordable housing. For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG).	Planning
CalHome <a href="http://www.hcd.ca.gov/fa/calhome">www.hcd.ca.gov/fa/calhome</a>	Grants to cities and non-profit developers to offer homebuyer assistance, including down payment assistance, rehabilitation, acquisition/rehabilitation, and homebuyer counseling. Loans to developers for property acquisition, site development, predevelopment and construction period expenses for homeownership projects	Predevelopment Site development Site acquisition Rehabilitation Acquisition/Rehab Down payment assistance Mortgage financing Homebuyer counseling

Program Name	Description	Eligible Activities
Multi-Family Housing Program (MHP)	Deferred payment loans to local governments, non-profit and for-profit developers for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower income households.	New Construction Rehabilitation Preservation Conversion of Nonresidential to Rental
Transit-Oriented Development Housing Program	Under the program, low-interest loans are available as gap financing for rental housing developments that include affordable units, and as mortgage assistance for homeownership developments. In addition, grants are available to cities, counties, and transit agencies for infrastructure improvements necessary for the development of specified housing developments, or to facilitate connections between these developments and the transit station.	Homebuyer Assistance Predevelopment Site development Infrastructure
CalHFA Homebuyer's Down payment Assistance Program	CalHFA makes below market loans to first-time homebuyers of up to 3% of sales price. Program operates through participating lenders who originate loans for CalHFA. Funds available upon request to qualified borrowers.	Homebuyer Assistance
Golden State Acquisition Fund (GSAF)	Affordable Housing Innovation Program (AHIP): provides loans for developers through a nonprofit fund manager to provide quick acquisition financing for the development or preservation of affordable housing.	New Construction Acquisition Rehabilitation Preservation
Infill Infrastructure Grant Program (IIG)	Provides grants for infrastructure construction and rehabilitation to support higher-density affordable and mixed-income housing in infill locations.	Predevelopment Site development Infrastructure
Multifamily Housing Program	Provides funding for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9% federal low income housing tax credits. Eligible costs include the cost of child care, after-school care and social service facilities integrally linked to the assisted housing units; real property acquisition; refinancing to retain affordable rents; necessary onsite and offsite improvements; reasonable fees and consulting costs; and capitalized reserves.	Acquisition Rental Assistance Public Services Site development Infrastructure Development Fees
Predevelopment Loan Program (PDLP)	Provides predevelopment capital to finance the start of low income housing projects.	Predevelopment

## 3. County Programs

Program Name	Description	Eligible Activities
Housing Choice Vouchers (formerly Section 8)	Rental assistance payments to owners of private market rate units on behalf of low-income (50% MFI) tenants.	Rental Assistance
Los Angeles County Housing Innovation Fund	LACHIF provides low-cost financing up to \$5,000,000 to support the creation and preservation of affordable housing, including supportive housing projects. Eligible entities include non-profit and for-profit developers, and cities in Los Angeles County.	Predevelopment Acquisition

## **Administrative Resources**

Described below are several non-profit agencies that are currently active and have completed projects in Los Angeles County. These agencies serve as resources in meeting the housing needs of the City, and are integral in implementing activities for acquisition/rehabilitation, preservation of assisted housing, and development of affordable housing. The City currently has a program within their Housing Plan to partner with affordable housing developers, including the three mentioned below.

### **National CORE**

National CORE is one of the most active affordable housing developers in California, especially in southern California. It has developed over 120 affordable housing projects nationwide. It has experience developing housing that caters to the diverse needs of seniors, special needs, and workforce, and a range of housing types such as multi-family, Project Homekey, mixed use, and intergenerational housing.

### **Habitat for Humanity**

Habitat is a non-profit, Christian organization that builds and repairs homes for sale to very low-income families with the help of volunteers and homeowner/partner families. Habitat homes are sold to partner families at no profit with affordable, no interest loans. The local affiliate, Habitat for Humanity, has been active in the region, rehabilitating or building new homes for families annually.

### **Jamboree Housing Corporation (JHC)**

JHC is a non-profit developer that has developed and implemented numerous affordable housing projects throughout Southern California and the State. Jamboree has also established an in-house social services division to assist residents in maintaining self-sufficiency. “Housing with a HEART” (Helping Educate, Activate and Respond Together) now operates at most Jamboree-owned properties.

### **Mercy Housing California**

Mercy Housing has offices in Los Angeles, San Francisco, and Sacramento. Mercy Housing serves more than 10,000 people at about 100 properties. Residents range from families to people with special needs to seniors.



## Opportunities for Energy Conservation

### Energy Efficiency Programs

While the City does not directly offer energy-efficient programs, it serves as an information center for the various programs available for area residents. Below is a list of energy efficiency programs offered by various organizations:

#### Southern California Edison (SCE)

The following two programs are offered by SCE to help lower income customers reduce energy costs and control their energy use:

**California Alternate Rates for Energy (CARE) /Family Electric Rate Assistance (FERA):** These programs provide income-qualified customers with much-needed bill relief.

**Arrearage Management Plan (AMP) Program:** This program is a debt forgiveness payment plan option for residential CARE and FERA customers who have past due bills totaling \$500 or greater which are at least 90 days old. In exchange for making on-time payment of your current monthly bill, AMP will forgive 1/12 of the eligible total past due amount.

**Energy Savings Assistance Program:** This program is designed to assist income-qualified households with the conserving of energy and reducing their monthly electrical costs. SCE may provide free appliances and installation of energy-efficient appliances like refrigerators and air conditioners, as well as home efficiency solutions like weatherization.

**Energy Assistance Fund (EAF) Program:** SCE and United Way work together to assist customers who are unable to pay their electric bill due to a financial constraint. A maximum of \$100 is available to eligible customers once in a 12-month period. The program has provided assistance for nearly 250,000 households since the fund started in 1982.

**Medical Baseline Allowance:** Customers with a medical condition that requires electricity- powered life support equipment may be eligible to receive additional baseline allocation. The Baseline program offers an additional year-round baseline allocation of 16.5 kWh per day in addition to a customer's applicable seasonal baseline and the baseline for its region.

#### Southern California Gas Company

The following programs are available to SoCalGas customers who reside in the City of Commerce:

**California Alternate Rates for Energy (CARE):** The CARE program provides eligible SoCalGas customers a 20 percent discount on their monthly gas bill. In addition, new customers who are approved within 90 days of starting new gas service will also receive a \$15 discount on the Service Establishment Charge.

**Energy Savings Assistance Program:** SoCalGas offers no-cost energy-saving home improvements and furnace repair or replacement services for qualified limited-income renters and homeowners. Available energy-saving services may include attic insulation, door weather-stripping, caulking, low flow shower heads and faucet aerators, water heater blankets, and energy education.

**Medical Baseline Allowance:** SoCalGas knows that not all customers are alike. Some of them suffer from poor health, which can make it even harder to make ends meet. If someone in the household has a life-threatening illness, is seriously disabled, or requires more heat in winter due to a serious health condition, the household may qualify for an additional allowance of gas at a lower rate.

**Residential Energy Efficiency Loan (REEL):** The REEL program offers a variety of financing options to owners and renters to purchase energy-efficiency products and upgrades. Eligible properties include single family homes, condominiums, townhomes, and 1-4 unit properties. Property owners are eligible for this program, as are renters who receive approval from their property owner.

### **Building and Site Design Conservation**

Many modern design methods used to reduce residential energy consumption are based on proven techniques. These methods can be categorized in three ways:

1. Building design that keeps natural heat in during the winter and out in the summer. Designs aim to reduce air conditioning and heating demands. Proven building techniques in this category include:
  - a. Orienting windows and openings of a building to follow the path of the sun, in order to minimize solar gain in the summer and maximize solar gain in the winter;
  - b. Utilizing “thermal mass,” earthen materials such as stone, brick, concrete, and tiles that absorb heat during the day and release heat at night;
  - c. “Burying” sections of the structure in a hillside or berm to insulate the home against extremes of temperature;
  - d. Application of window coverings, insulation, and other materials to reduce heat exchange between the interior and the exterior of the home;
  - e. Strategic placement of openings and the use of ventilating devices that take advantage of natural air flow (particularly cool evening breezes); and



- f. Designing eaves and overhangs above windows to block direct summer solar gain during the summer, but allow for solar gain during the winter.
2. Building orientation that allows natural elements to maintain a comfortable interior temperature. Examples include:
  - a. Orienting the long axis of a building in a north-south position;
  - b. Minimizing the southern and western exposure of exterior surfaces; and
  - c. Designing the structure to admit the maximum amount of sunlight into the building and to reduce exposure to extreme weather conditions;
  - d. Positioning dwelling units to take advantage of natural air circulation and evening breezes.
3. Use of landscaping features to moderate interior temperatures. Such techniques include:
  - a. Planting of deciduous shade trees and other plants to protect the home;
  - b. Design including natural or artificial flowing water; and
  - c. Strategic placement of trees and hedges to control air flow.

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# CHAPTER 5: HOUSING PLAN

## Summary of Housing Issues

Virtually all of the land area within Commerce's corporate boundaries was developed prior to the City's incorporation in 1960. Over the years, the lack of available land has presented unique challenges to the City's efforts to provide housing for its residents. Key issues related to housing that are the focus of this Housing Element are described below.

- Nearly 99 percent of the City of Commerce's residents live in the eleven well-defined neighborhoods that are scattered throughout the City. Most housing units in these neighborhoods were constructed before 1960, although in general the housing stock is in good condition.
- The City's distinct neighborhoods are surrounded by industrial and commercial uses leaving them impacted by the related truck traffic, freeway noise, air quality issues, and environmental justice concerns. New residential development must be strategically located and the proper environmental analyzes completed before construction occurs.
- The average household size decreased between 2010 and 2020 from 3.89 persons to 3.61 persons due to an aging population. Median age in the City increased from 28.1 to 37.5 during the same period.
- A significant number of households in Commerce are overcrowded, and the garages of some homes have been illegally converted into living quarters. Overcrowding rate was reported at 16 percent in 2020 compared to 11 percent countywide.
- While housing costs in Commerce are relatively low in comparison to the region, 39 percent of the households in the City experienced housing cost burden due to the lower incomes of Commerce households.
- In 2021, the City's housing inventory included 3,524 housing units. Of this total, 78 percent are classified as single-family, 7 percent are in structures containing between 2 to 4 units, and 15 percent are located in multiple-family developments containing five or more units.

## Goals and Policies

For the City of Commerce the enduring objective is to facilitate and encourage housing that fulfills the diverse needs of the community. To achieve this goal the Housing Plan identifies long-term housing goals and shorter-term policies to address the identified housing needs. The goals and policies are then implemented through a series of housing programs. Programs identify specific actions the City plans to undertake toward achieving each goal and policy.

The goals, policies, and programs within the Housing Plan build upon the identified housing needs in the community, constraints confronting the City, and resources available to address the housing needs. This Plan will guide City housing policy through the 2021-2029 planning period. Commerce's housing goals, policies, and programs address the following five major areas:

1. Identification of adequate sites to achieve a variety and diversity of housing;
2. Increased opportunities for a variety of housing types for all income groups;
3. Removal of constraints to the construction of affordable housing;
4. Conservation of the City's existing housing stock; and
5. Affirmatively furthering fair housing.

### **Goal 1: Identify Adequate Sites to Achieve Housing Variety.**

Meeting the housing needs of all residents of the community requires the identification of adequate sites to accommodate a variety of housing types. The City will assure that adequate residentially-zoned and mixed-use sites are available to accommodate the 2021-2029 RHNA allocation.

Policy 1.1: Provide a range of residential development types in Commerce, including low density single-family homes, moderate density townhomes, higher density multi-family units, and residential/commercial mixed use in order to address the City's share of regional housing needs.

Policy 1.2: Provide incentives to facilitate the development of housing options for households with special needs.

### **Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.**

Commerce strives to achieve a balanced community, with housing units available for all income segments of the population. The existing housing stock offers many affordable options throughout the City. The intent of this goal is to assist in the provision of adequate

housing to meet the needs of the community, including the needs of both renter- and owner-households.

Policy 2.1: Continue to participate in State and federally sponsored programs designed to maintain housing affordability.

Policy 2.2: Explore opportunities for new residential development within those areas of the City occupied by vacant, obsolete commercial and industrial uses.

Policy 2.3: Continue to provide development incentives, when possible, to support non-profit and for-profit organizations in their efforts to construct, acquire, and improve affordable housing.

Policy 2.4: Facilitate development of special needs and low income housing through use of financial and/or regulatory incentives.

Policy 2.5: Ensure that potential sites for residential development, located in those areas that were previously occupied by nonresidential land uses, are investigated to determine whether or not previous on-site uses present potential health risks.

**Goal 3: Minimize the impact of governmental constraints on housing production and affordability.**

Market, environmental, and governmental factors pose constraints to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower and moderate-income households due to their limited resources for absorbing the costs. The City is committed to removing governmental constraints that hinder the production of housing, streamlining permitting process to facilitate efficient entitlement and building permit processing, and offering incentives to mitigate market constraints.

Policy 3.1: Support innovative public, private and non-profit efforts toward the development of affordable housing.

Policy 3.2: Periodically review and revise the City's development standards, if necessary, to facilitate quality housing that is affordable to all income levels.

Policy 3.3: When feasible, consider reducing, subsidizing, or deferring development fees to facilitate the provision of affordable housing.

Policy 3.4: Continue the provision of incentives, including density bonus, which encourages developers to include affordable units in their projects.

Policy 3.5: Facilitate accessory dwelling units on single-family parcels as a means of providing additional infill housing opportunities.

**Goal 4: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.**

Continued maintenance and preservation of the existing housing stock in Commerce is crucial to ensure quality neighborhoods. Housing programs focused on the achievement of this goal include rehabilitation of single- and multi-family housing units, code enforcement, and efforts to preserve assisted housing units at risk of converting to market-rate housing. Through code enforcement, neighborhood, and home improvement programs, the City is able to maintain the condition of existing housing units.

Policy 4.1: Promote, maintain, and enhance the character and identity of the City’s residential neighborhoods through adequate code enforcement.

Policy 4.2: Provide financial assistance, when available, to rehabilitate dwelling units owned or occupied by special needs and lower income households.

Policy 4.3: Encourage property owners to rehabilitate substandard residential units and maintain their properties to the greatest extent possible.

Policy 4.4: Promote increased awareness among property owners and residents of the importance of property maintenance to long-term affordable housing.

Policy 4.5: Design new higher-density residential projects at a scale (number of units, height, etc.) that is compatible in design with adjacent residential areas.

Policy 4.6: Cooperate with non-profit housing providers in the acquisition, rehabilitation, and maintenance of older apartment complexes, single-family houses and hotel/motels to be preserved as long-term affordable housing.

Policy 4.7: Monitor affordable housing developments, accessory dwelling units, and vacant units within the City, and work to preserve existing affordable housing that is considered at risk of converting to market-level rents.

**Goal 5: Affirmatively further fair housing.**

Ensure equal housing opportunity for all, regardless of their special characteristics as protected by local, state, and federal fair housing laws.

Policy 5.1: Comply with federal, state, and local Fair Housing and anti-discrimination laws, and affirmatively further fair housing for all, ensuring equal access to housing regardless of their special circumstances as protected by fair housing laws.

Policy 5.2: Promote housing mobility by expanding housing choices and increasing housing opportunities in higher resource areas.

Policy 5.3: Protect tenants from discriminatory housing practices and displacement.

Policy 5.4: Promote the integration of affordable and special needs housing projects in existing neighborhoods.

Policy 5.5: Collaborate with and support efforts of organizations dedicated to eliminating housing discrimination.

## Implementation Programs, Actions, and Objectives

### Goal 1: Identify Adequate Sites to Achieve Housing Variety.

#### *Program 1.1 – Adequate Sites for RHNA and Monitoring of No Net Loss*

For the 2021-2029 planning period, the City of Commerce has an assigned RHNA allocation of 247 units (55 very low income, 22 low income, 39 moderate income, and 131 above moderate income units). As of May 2023, the City had issued permits for 31 new units and approved entitlement for 102 units during this planning period. Along with 16 projected ADUs, the City has met all its RHNA for above moderate income units and a portion of it lower and moderate income units. The remaining RHNA is 105 units (52 very low income, 15 low income, and 38 moderate income units) that the City must identify adequate sites to allow for future development.

City-owned vacant and underutilized sites in existing residential zones can accommodate 29 additional units (6 very low income, 6 low income, and 17 moderate income units). The remaining 76 units (46 very low income, 9 low income, and 21 moderate income) can be accommodated on City-owned underutilized nonresidential sites where the City is proposing to redesignate as mixed use as part of the Comprehensive General Plan Update that is underway. Rezoning to implement the General Plan will follow within one year of the General Plan Update. The proposed land use densities for these mixed use designations ranges from are 40 to 60 and 40 to 85 du/ac. The minimum density at these mixed use zones is 40 units per acre. Specifically, the identified mixed use sites in the inventory are all located along Atlantic Boulevard and Washington Boulevard with a density range of 40 to 85 du/ac. Therefore, for the remaining 76 units of RHNA that must be accommodated on sites requiring rezoning to mixed use, the City is committed to rezoning at least two acres of mixed use land based on a minimum density of 40 units per acre.

The rezoned sites will meet the requirements of Government Code 65583.2, including but not limited to a minimum density of 20 units per acre, minimum site size to permit at least 16 units on site, and zoned to allow ownership and rental housing by right in which at least 20 percent of the units are affordable to lower income households. As part of the rezoning, appropriate development standards (including but not limited to setbacks, lot coverage, height, and parking, among others) will be established to ensure the allowable maximum density of each zone can be achieved.

To further encourage and facilitate the development of affordable housing, the City will offer streamlined processing, fee modifications, density bonus incentives, reductions in development and parking standards, and funding, when available, for off-site improvements and any required environmental cleanup.

Pursuant to Government Code Section 65583.2, reusing the following types of sites in the City's site inventory for lower income RHNA are subject to by-right approval exempt from CEQA and subject only to design review based on objective standards when a project includes 20 percent of the units affordable to lower-income households and no subdivision is proposed:

Reuse Sites (No Rezoning Required):

- Vacant sites that were identified in the City's 4th and 5th cycles Housing Element as sites for lower income RHNA; and
- Nonvacant sites that were identified in the City's 5th cycle Housing Element as sites for lower income RHNA.

The by-right approval requirement of reuse sites is effective December 31, 2024.

- Rezoning of sites past the statutory deadline of the Housing Element to meet the lower income RHNA
- The by-right approval requirement of rezone sites is triggered by the rezoning.

Timeline and Objectives:

- Provide land availability and development incentives to promote development of 105 units on City-owned sites. Actions include:
  - By August 2024, Ccomplete redesignation of City-owned nonvacant sites for residential mixed use development, adequate to accommodate the shortfall of remaining 76 lower income units through General Plan Update by the end of 2023. Redesignate and rezone at least two acres of mixed use along Atlantic and Washington Boulevards at a density range of 40 to 85 du/ac.
  - By the end of 2024, Ccomplete rezoning of City-owned nonvacant sites by the end of 2024 as part of the comprehensive update to the Zoning Code.
  - As part of the rezoning, establish a procedure to provide by-right approval of projects on reuse sites (identified in the previous Housing Elements) and rezone sites that include 20 percent of the units as housing affordable to lower income households.

- Monitor the development of Rosewood Village Sites 1A and 2, including the units designated for workforce housing. By the end of 2026, if the building permits for these sites have not been issued, alternative sites will be explored to accommodate 102 units.
- Monitor the development of City-owned sites listed on the inventory. By the end of 2026, if planning applications have not been received on these sites, alternative sites will be explored identified to accommodate the remaining RHNA of 105 units.
- Maintain an inventory of the available sites for residential development and make it available on City website. Update sites inventory annually.
- By the end of 2024 have a disposition schedule prepared for City-owned sites in compliance with the Surplus Land Act.
- By July 2025, issue Requests for Proposal to solicit affordable housing development on the City-owned sites identified in the Sites Inventory.
  - Include the following incentives in the RFPs:
    - streamlined processing,
    - fee modifications,
    - density bonus incentives,
    - reductions in development and parking standards, and
    - funding, when available, for off-site improvements and any required environmental cleanup
- Maintain an inventory of the available sites for residential development and make it available on City website. Update sites inventory annually.
- Comply with SB 166 (No Net Loss) by monitoring the consumption of residential and mixed use acreage to ensure an adequate inventory is available to meet the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 by the end of 2024. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA. Monitoring will be conducted annually to ensure the City maintains an adequate buffer for the remaining RHNA. If the buffer is diminishing, the



City will undertake a proactive and coordinated approach to replenish the sites inventory

- ~~By July 2025, issue Requests for Proposal to solicit affordable housing development on the City-owned sites identified in the Sites Inventory.~~

Responsible Agency: Planning Division

Funding Source: General Fund

### ***Program 1.2 – Replacement Housing***

Development on nonvacant sites with existing residential units is subject to replacement requirement, pursuant to AB 1397. Specifically, AB 1397 requires the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law. [Replacement housing must also comply with Gov Code 65915 c 3.](#)

#### Timeline and Objectives:

- By the end of 2024, update the Zoning Code to address the replacement requirements.

Responsible Agency: Planning Division

Funding Source: General Fund

### ***Program 1.3 – Accessory Dwelling Units***

The City will facilitate the development of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs). The City last updated its ADU standards in August 2020 (Ordinance No. 761) to comply with California Government Code Sections 65852.2 and 65852.22. The existing ordinance complies with State requirements pertaining to unit size, location, and number of units permitted, parking, and other provisions. However, since 2020, the State legislature has passed additional bills related to ADUs. In order to help facilitate the development of ADUs, the City will amend the Zoning Code to comply with State law and provide information about ADUs and the approval process on the City website.

#### Timeline and Objectives:

- Facilitate construction of 16 ADUs within the planning period.
- By the end of 2023, update City website to provide a link to California Housing Finance Agency (CalHFA) ADU Grant Program.

- By the end of 2024, update the Zoning Code to comply with State requirements for ADUs, including AB 2221 and SB 897.
- By the end of 2024, develop an information sheet/brochure on ADUs [and JADUs](#), including building requirements and the permitting process, that may be given to interested property owners and kept at the Planning/Community Development Department. This information should also be included on the City website.
- By the end of 2024, develop and include a Fair Housing Factsheet, especially on Source of Income protection (i.e., use of public subsidies such as Housing Choice Vouchers for housing payments) in the ADU application packet.
- **By the end of 2024, develop incentives to encourage development of ADUs, including financial assistance (from state programs if available) to assist lower income homeowners with construction, among others. [Possible incentives may include pursuing state or federal funding to assist in the construction of ADUs or JADUs if the owner\(s\) agree to make the unit affordable to lower income households for a certain amount of time.](#)**
- [Work with the Gateway Cities Council of Government \(GCGOC\) on prototype plans that can be made available to Commerce property owners.](#)
- [Hold quarterly workshops to discuss the City permitting process and requirements and potential funding opportunities in the area if available.](#)
- [Annually monitor the production of ADUs and JADUs in Commerce. In 2025 and 2027, if production is not in line with assumptions in this Housing Element, implement additional incentives and tools by the end of 2027 to encourage ADU permits.](#)
- Responsible Agency: Planning Division

### ***Program 1.4 – Extremely Low-Income and Special Needs Housing***

To assist in the development of housing to meet the needs of extremely low, very low and low income households, the City offers fast track processing, development fee modifications, density bonus incentives, reductions in development and parking standards, and funding for off-site improvements. The City prioritizes funding opportunities to ensure that extremely low and very low income housing are given precedence and are able to easily access the financial and regulatory incentives offered by the City.

#### Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, establish incentives and appropriate development standards that can be

implemented to encourage development of housing for lower income households. [These incentives can include streamlined processing, fee modifications, density bonus incentives, reductions in development and parking standards and funding, when available, for off-site improvements and any required environmental cleanup.](#)

- [Utilizing affordable housing developer information from the Gateway Cities Council of Governments, contact developers about potential opportunities in Commerce.](#)
- [During the planning period, utilize City-owned sites to meet the housing needs of lower income households. See Program 1.1 for the incentives, timelines and outreach for development of City-owned sites.](#)
- [Utilize the above measures to help facilitate the development of 40 affordable housing units by 2026. If this goal is not reached by December 2026, develop alternative methods and incentives to facilitate development by July 2027.](#)

Responsible Agency: Planning Division

Funding Source: General Fund

### ***Program 1.5 – Alternative Housing Models***

The City recognizes the changing housing needs of its population, including aging seniors in need of supportive services. To meet such needs, the City can encourage, through development incentives, the provision of more innovative housing types that may be suitable for the community, including community care facilities, supportive housing, and assisted living for seniors. Assisted living facilities are designed for elderly individuals needing assistance with activities of daily living but desiring to live as independently as possible for as long as possible. Such facilities bridge the gap between independent living and nursing homes, and offer residents help with daily activities such as eating bathing, dressing, laundry, housekeeping, and assistance with medications. Assisted living can help to meet the housing and supportive services needs of Commerce’s relatively large and growing senior population. Other alternative housing models such as micro units, live/work units, and co-housing will also be considered.

#### Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, establish incentives and appropriate development standards that can be implemented to encourage development of alternative housing models.

Responsible Agency: Planning Division

Funding Source: General Fund

**Program 1.6 – Housing Element Monitoring and General Plan Consistency**

As required by State law, the City will review the status of the Housing Element programs annually. Annual review will cover consistency with the Housing Element and the other General Plan Elements. This includes when the General Plan Update is adopted in Summer/Fall 2024.

Responsible Agency: Planning Division

Funding Source: General Fund

**Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.**

***Program 2.1 – First Time Homebuyer 2.0 Program***

The First Time Homebuyer 2.0 Program has been used to provide income-qualified (up to 175 percent AMI) Commerce residents secondary financing of up to \$150,000 to assist with down payment and closing costs related to purchasing a new home within the Rosewood Village housing development. Up to nine (9) qualified and eligible participants were chosen through a lottery process during 2022. The City will continue to offer homebuyer assistance through partnership with developers. The Modelo project also provides 85 units as workforce housing (up to 175 percent AMI).

Lower income residents in Commerce are also eligible to apply for first-time homebuyer assistance administered by the Los Angeles County Development Authority (LACDA). The Home Ownership Program (HOP) provides a second mortgage loan for first-time homebuyers with an assistance amount of up to \$85,000, or 20 percent of the purchase prices, whichever is less. The loan provides down payment and/or closing assistance and is secured with a Deed of Trust and Promissory Note. The HOP offers zero percent interest loans with a deferred payment. Repayment is required when the home is sold, there is a transfer of title, or the home is no longer owner-occupied. To qualify, a homebuyer must not have owned a home in the last three years and the home must be owner-occupied.

**Timeline and Objectives:**

- By the end of 2023, update City website to provide a link to California Housing Finance Agency (CalHFA) homebuyer assistance programs, as well as to HOP offered by LACDA.
- Provide first-time homebuyer assistance to 85 households through development of the Modelo Specific Plan through 2029.

- Partner with the City’s Library Social Services Division to have information about the First Time Homebuyer 2.0 program available at the library and community centers.
- Beginning in 2024 and annually thereafter, pursue funding from State and federal programs to provide homebuyer assistance to lower and moderate income households.

Responsible Agency: Planning Division

Funding Source: Development Agreement

**Goal 3: Minimize the impact of governmental constraints on housing production and affordability.**

***Program 3.1 - Atlantic Blvd. and Washington Blvd Mixed-Use Areas***

In the 2020 General Plan, a Mixed-Use designation along the Atlantic Boulevard corridor between the Mixmaster (on the north) and Washington Boulevard (on the south) was created. This land use designation provides for both residential development and commercial development. The City is in the process of updating the General Plan, with adoption anticipated by the end of 2023. In addition to the current Atlantic Mixed-Use designation (which will be renamed Mixed-Use/Atlantic), the General Plan Update will include two other residential mixed use categories: Mixed-Use and Mixed-Use/Washington 1. The Mixed-Use land use designation will have a density of 40-60 dwelling units per acre while the Mixed-Use Atlantic and Mixed-Use Washington 1 designations will have densities of 40-85 dwelling units per acre. The General Plan update will include design guidelines for these mixed-use areas.

Timeline and Objectives:

- By the end of ~~2023~~ 2024 as part of the General Plan update, develop objective design/development standards for the City’s mixed-use land use areas. The City will ensure that such standards can facilitate development at the maximum allowable densities.
- Annually, contact developers in the area to inform them of potential opportunity sites, the established development standards, and other pertinent information.

Responsible Agency: Planning Division

Funding Source: General Fund

### **Program 3.2 – Zoning Ordinance Amendments**

Once the General Plan Update is completed, a comprehensive Zoning Ordinance update will be conducted to ensure consistency and compliance with various State laws, as well as potential constraints to development. The Zoning Ordinance update will include:

- **Residential Development Standards:** Establish appropriate development standards to facilitate the achievement of maximum allowable density in the respective residential and mixed use zones. These include parking, height, setbacks, and lot coverage requirements.
- **Emergency Shelters and Low-Barrier Navigation Centers:** Designating emergency shelters as a permitted use in the M-1 zone no longer conforms with State law (AB 2339), the City will designate emergency shelters by right in the new Mixed Use or Mixed Use/Atlantic designations where multi-family, mixed use, and live/work housing, among other housing types are permitted. The Zoning Ordinance update will include language regarding emergency shelters being permitted by right without discretionary action. Updates to the Zoning Ordinance must also be made to comply with AB 139 (permit by-right shelters, parking and distance requirements), ~~and~~ AB 101 (Low Barrier Navigation Centers) and AB 2339 (sufficient site capacity in a zone that permits residential uses and expanding the definition of emergency shelters to include interim housing options).
- **Multi-Family Parking Requirement:** Currently, the Zoning Ordinance requires one garage space per unit plus ½ guest space for efficiency/one-bedroom units and two garage spaces and ½ guest space per unit for two or more bedrooms. These standards may be a constraint to multi-family development. During the Zoning Ordinance update process, establish appropriate parking standards to facilitate multi-family housing and mixed use development. The Zoning Ordinance update will include language that includes Other parking incentives such as shared parking and tandem parking for eligible projects. will be considered.
- **Transitional and Supportive Housing in C-2 Zone:** The City will amend the Zoning Code to permit transitional and supportive housing similar to other residential uses of the same type in the same zone. Currently, transitional and supportive housing are not permitted in the C-2 zone where residential uses are permitted. Amend the Zoning Ordinance to permit transitional and supportive housing in the C-2 zone (or equivalent nonresidential zones that permit housing and mixed use zones to implement the updated General Plan).
- **Supportive Housing (AB 2162) –** The City will also amend the Zoning Ordinance to comply with AB 2162 for supportive housing meeting specific conditions to be permitted by right where multi-family housing and mixed uses are permitted including nonresidential zones permitting multi-family uses, pursuant to

Government Code 65561. In addition, if supportive housing ~~and if~~ located within 0.5 mile from transit, no minimum parking requirements can be requested.

- Single Room Occupancy Housing – The City will amend the Zoning Ordinance to address the provision of SRO housing in mixed use zones (SROs are currently permitted in the R1, R2 and R3 zones).
- **Employee Housing:** No areas in the City are designated or permit commercial farming activities. Amend the Zoning Ordinance to comply with the State Employee Housing Act, which requires employee housing for six or fewer employees to be treated as a single-family structure to be permitted in the same manner as similar uses in the same zone.
- **Large Residential Care Facilities (Seven or More):** Amend the Zoning Ordinance to conditionally permit large community care facilities in zones where residential uses are permitted, including mixed use zones. Conditions for approval will be objective and as other similar residential uses of the same type in the same zone to provide for certainty in outcomes.
- **Reasonable Accommodation:** Currently, the Zoning Ordinance’s required finding relating to adverse impact on surrounding properties or uses can be considered subjective and constraining to the development or improvement of housing for persons with disabilities. During the comprehensive Zoning Ordinance update, remove this subjective finding.
- **Accessory Dwelling Units:** Recent bills (AB 2221 and SB 897) passed in October 2022 provide additional clarifications to the Government Code regarding ADU regulations. The Zoning Ordinance will be amended to comply with State law.
- **Density Bonus:** The City’s Density Bonus ordinance was last updated in 2013. Amend the Zoning Ordinance to comply with State law.
- **SB 35 and SB 330 Compliance:** The City will establish a standard procedure for processing SB 35 eligible projects and to comply with SB 330, pursuant to State law.

Timeline and Objectives:

- By the end of 2024, comprehensively update the Zoning Ordinance, including specific revisions as outlined in this program in compliance with State law and to remove barriers and constraints to housing development.

Responsible Agency: Planning Division

Funding Source: General Fund



### **Program 3.3 - Lot Consolidation Program**

Parcels located in specific areas of the City along Atlantic Boulevard and Washington Boulevard tend to be narrow and shallow in size, which can act as a constraint to the development of larger housing projects. To encourage the development of higher density residential and mixed-use projects on vacant and underutilized sites, the City offers incentives to encourage lot consolidation, including but not limited to: development standard modifications (i.e. lot size, parking, and open space requirements), streamlined processing, and assistance with development fees, when funding is available.

#### Timeline and Objectives:

- By the end of 2024, as part of the Zoning Ordinance update, establish additional incentives for lot consolidation, including, ministerial approval of lot line adjustments and flexible development standards (reduced or alternative parking requirements and reduced setbacks) for large sites.
- Annually Notify housing developers and property owners of development incentives and opportunities for lot consolidation.
- Establish an outreach program to local real estate brokers to promote opportunities for lot consolidation.
- Using the 6<sup>th</sup> Cycle Housing Element's sites inventory, consolidate City-owned parcels to create six developable sites.

Responsible Agency: Planning Division

Funding Source: General Fund

### **Program 3.4 - Streamlined Processing**

The City continues to monitor permit processing times to ensure the fastest possible turnaround for applications and identify any impediments to affordable housing. Additionally, the processing of applications for new construction or rehabilitation of housing for lower and moderate-income households and seniors will be prioritized. To comply with SB 9, the City will facilitate ministerial approvals for lot splits in the R-1 zone.

#### Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, facilitate ministerial approvals for lot splits in the R-1 zone.
- Continue to monitor permit processing times and investigate ways to streamline the process. Prioritize the review of projects that include affordable housing units.

Responsible Agency: Planning Division



Funding Source: General Fund

***Program 3.5 – Incentives for Affordable Units for Large Households and Multigenerational Households***

The City recognizes that housing priorities shift over time as housing needs change. The characteristics of the City’s current housing need have been identified through the Needs Assessment, specifically the analysis of the special needs groups. Based on the needs analysis completed for this Housing Element, there is a need to provide both affordable rental and homeownership units for large families. In addition, the concept of multigenerational family housing is an important option to be considered. The City is actively pursuing affordable homeownership for its workforce through development agreements, including for the Modelo Specific Plan and the Rosewood Village projects. The City will be pursuing other affordable housing opportunities using City-owned properties.

During the comprehensive Zoning Ordinance update, the City will establish incentives and/or regulations to promote the development of rental and ownership housing with three or more bedrooms. As part of the Modelo Specific Plan, the City has included flexible development standards to encourage and facilitate an increased number of larger units.

Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, establish additional incentives and/or development regulations to promote the development of rental and ownership housing with three or more bedrooms.
- To increase the number of affordable multi-bedroom units to accommodate large low income households, pursue affordable housing for larger and multigenerational households using City-owned properties.
- Explore options for larger units with interested developers and property owners.

Responsible Agency: Planning Division

Funding Source: General Fund

***Program 3.6– Off Site Improvements***

On a case-by-case basis, the City will provide opportunities for public, private and non-profit groups to develop affordable housing by constructing off-site improvements and physical infrastructure as Capital Improvement Projects. Assistance provided by the City may include traffic, street and sewer upgrades as well as other pedestrian and mobility

improvements. The City will work directly with developers, on a case-by-case basis, to determine the feasibility of providing assistance.

Timeline and Objectives:

- Facilitate the development of affordable housing by allowing improvements to be negotiated.

Responsible Agency: Planning Division

Funding Source: General Fund

***Program 3.7 – Water and Sewer Service Providers***

In accordance with Government Code Section 65589.7, immediately following City Council adoption of the Housing Element, the City will deliver a copy of the 2021-2029 Housing Element to all public agencies or private entities that provide water or sewer services to properties within the City of Commerce.

Timeline and Objectives:

- Ensure that water and sewer providers are aware of the City’s intentions for residential development by providing copies of the 2021-2029 Housing Element upon adoption of the Housing Element by December 2023.

Responsible Agency: Planning Division

Funding Source: General Fund

***Program 3.8 – Objective Design/Development Standards***

Objective standards are generally defined by state law as standards that involve no personal or subjective judgment and that rely on a uniform benchmark or criterion available and knowable prior to application submittal. The standards are intended to ensure that development exhibits high quality design while providing clear direction to designers and developers. to

Timeline and Objectives:

- The City will hire a consultant by December 2024 to develop objective design/development standards for residential and mixed use areas for multi-family housing and mixed use development.

Responsible Agency: Planning Division

Funding Source: General Fund

## **Goal 4: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.**

### ***Program 4.1 - Code Enforcement***

The objective of the City's Code Enforcement Program is to bring substandard units into compliance with City codes. Potential code violations are identified based on exterior windshield surveys and complaints reported to the City. The City's code enforcement officers work closely with Housing Division and Planning Division staff, as well as property owners, to identify units in need of housing assistance. To address the continuing problem of illegal units and garage conversions, code enforcement officers survey the City to identify such units. They then notify the property owner that they are in violation of City law, and enforce the necessary actions required to bring properties into compliance with City Codes. These efforts are intended to improve the condition of housing units and maintain neighborhood character throughout the City.

When appropriate, code enforcement officers provide property owners notice of any rehabilitation assistance for which they may be eligible to assist in correcting code violations. Eligible residents are typically referred to Neighborhood Fix-Up Grant, and the CDBG Home Preservation Grant Program. As described in the Needs Assessment, Code Enforcement conducted a windshield survey of the residential areas of the city and estimated that there are approximately 180 to 200 housing units in need of rehabilitation or replacement.

#### Timeline and Objectives:

- Every two years during the planning period, conduct window surveys to determine housing units that are in need of rehabilitation and repairs. Information about the Neighborhood Fix-Up Grant and CDBG Home Preservation Grant Programs shall be provided to the property owners.

Responsible Agency: Code Enforcement Division

Funding Source: General Fund

### ***Program 4.2 - Neighborhood Fix Up Grant Program***

The Commerce Community Development Commission established the Neighborhood Fix-Up Grant Program to provide financial assistance to City of Commerce residents for the improvement of their homes. The Neighborhood Fix-Up Grant Program reimburses residents with grant funds up to \$1,000 for the materials purchased to complete upgrades to the exterior portion of their home that is visible from the street. Over the years, the Neighborhood Fix-Up Grant Program has proven to be successful in revitalizing residential areas in the City. Between 2014 and 2021, approximately 98 homes were

assisted through the Neighborhood Fix-Up Program. The funding for this program is through Measure A. Information about the program will be added to the City website and provided at City Hall and other public locations to reach as many households as possible.

**Timeline and Objectives:**

- During the planning period, assist 100 households with Neighborhood Fix-Up Program
- Create informational brochures about the Neighborhood Fix-Up Program to have available at City Hall, other public locations and on the City website.

**Responsible Agency:** Planning Division, Housing Division and Code Enforcement Divisions

**Funding Source:** Measure A

***Program 4.3 – CDBG Home Preservation Grant Program***

The City of Commerce as a subgrantee of the Los Angeles Community Development Authority (LACDA) Federal Community Development Block Grant (CDBG) funds, has implemented the Home Preservation Grant Program. This program was established to address substandard housing conditions and to promote property maintenance by providing residential rehabilitation grants to qualified low- and moderate-income residents living in single-family owner-occupied dwellings. The Housing Division administers the program and provides funds, up to \$20,000, to qualified applicants to complete improvements to their residence. Between 2014 and 2021, a total of \$1,083,507 was allocated to the Home Preservation Grant Program. The City assisted between 3 to 6 households annually. The City website includes information on the grant program's guidelines as well as an interest form for residents to fill out and submit to the Economic Development and Planning Department

**Timeline and Objectives:**

- During the planning period, assist 40 households (average of five households annually) with the Home Preservation Grant Program.

**Responsible Agency:** Planning, Housing, and Code Enforcement Divisions

**Funding Source:** CDBG funds

#### ***Program 4.4 - Monitor and Preserve Affordable Housing***

There are currently ~~three~~ seven publicly federally-assisted multi-family rental complexes in Commerce with affordability covenants totaling 354 units and including:

- Rosewood Park Senior Apts. - 94 units
- Studio 6 LA Commerce - 81 units
- TELACU Manor - 75 units
- TELACU Gardens - 24 units
- Commerce Family Homes - 10 units
- Commerce Senior Apartments - 68 units
- Commerce Watcher St Homes - 4 units

~~According to the California Housing Preservation Commission, three projects with 82 units (Commerce Family Homes, Commerce Senior Center, and Commerce Watcher St. Homes) are considered at risk of conversion to market rate housing - 55 units at the Rosewood Park Senior Apartments, 24 units at TELACU Gardens and 76 units at TELACU Manor. Commerce's assisted units are all at risk based on the expiration of restrictions for low income use through various financing sources or expiration of Section 8 rental assistance, contracts. However, while the units described in Table 2-30 may meet the definition of at risk of conversion as described in Government Code Section 65583, the risk of conversion for two of these complexes is low because they are owned by The East Los Angeles Community Union (TELACU), whose mission as a nonprofit organization is to provide affordable housing for seniors. The Needs Assessment looked at preservation and replacement options for the at-risk units, including transfer of ownership, replacement and rental assistance. In the unlikely event that the City receives notice of a potential conversion of the federally assisted units, the Housing Division will contact the owners to pursue preservation of these units as affordable housing.~~

All dwelling units that receive public assistance in the City (including rehabilitation assistance and land write-down projects) shall continue to have affordable housing agreements filed with the land to ensure the long-term affordability of the units. At such time that a housing unit's affordability covenant nears expiration and the owner wishes to sell the unit at (market rate), the City will work with the seller to ensure that the affordability status is maintained.

#### Timeline and Objectives:

- When the City receives notice of a potential conversion of the federally assisted units, contact the property owners to pursue options to preserve these units as affordable housing. Ensure the owners comply with the State notification

requirements to notify their tenants three years, one year, and six months in advance of conversion.

- Maintain contact with affordable housing developers with interest in preserving affordable housing and alerting these organizations the potential conversion of assisted units.
- In the event of potential conversion, work with nonprofit developers to pursue funding available at State and federal levels to preserve the affordable units.
- Throughout the planning period, all dwelling units that receive public assistance in the City (including rehabilitation assistance and land write-down projects) shall continue to have affordable housing agreements filed with the land to ensure the long-term affordability of the units.

Responsible Agency: Housing Division

Funding Source: General Fund; State and federal funds

## **Goal 5: Affirmatively further fair housing.**

### ***Program 5.1 – Affirmatively Furthering Fair Housing***

The City is committed to affirmatively further fair housing in the community. Actions to foster equal housing opportunities are centered on several theme:

- Collaborate with and support efforts of organizations dedicated to eliminating housing discrimination in Commerce.
- Facilitate the development of a variety of housing types to foster housing mobility.
- Pursue actions and policies that mitigate economic displacement of residents.
- Distribute new affordable housing opportunities throughout the City to avoid overconcentration low income housing in specific neighborhoods.
- Employ place-based strategies for neighborhood improvements.

The City's actions to further fair housing are summarized in Table 5-1.

**Table 5-1: Affirmatively Furthering Fair Housing Matrix**

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
<b>Fair Housing Outreach and Enforcement</b>				
AFFH Actions	Coordinate with the Housing Rights Center (HRC) to conduct fair housing testing in Commerce	By the end of 2024 and 2026	Citywide	Contact HRC in 2024 to establish baseline service records for Commerce and seek to increase outreach and service to residents, landlords, and housing professionals by 20 percent over eight years
	Continue to contract with HRC to provide residents with fair housing services and refer housing complaints to the HRC as appropriate.	Annually	Citywide	
	Conduct fair housing outreach and education workshops targeted for Commerce residents and property owners	Twice during the planning period (end of 2024 and 2026)	Citywide	
	Promote multi-lingual housing resources, including fair housing services, via the City's website, City Hall, library, community center and on social media platforms.	Ongoing	Citywide	
	<a href="#">Utilize the Community Based Organizations (CBO) list available through the Gateway Cities Council of Governments (GCCOG) to identify organizations that conduct neighborhood level outreach. Coordinate efforts with these organizations to target outreach in areas of the City that face education and transportation challenges.</a>	<a href="#">Contact CBOs by July 2024. Develop outreach strategy by end of 2024. Include information in the fair housing workshops outlined above (twice during planning period).</a>	<a href="#">Tract 2303 for education outreach; Ayers and Darwell neighborhoods for transportation services, west of Atlantic Boulevard and Lanto Pacific, Darwell and Veterans Park neighborhoods for cost burden</a>	
	Participate in Gateway Cities Council of Governments (GCCOG) study on AFFH policy implementation study. Work with other Gateway Cities to identify collaborative efforts, especially in outreach and education.	December 2023	Citywide	
<b>Housing Mobility and New Opportunities in High Resource Areas</b>				

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
AFFH Action	<p>Coordinate with the Los Angeles County Housing Authority in 2023 about utilizing a mobility counseling program in Commerce. This program would market landlords and property owners and inform Housing Choice Voucher holders about their residential options in areas throughout the City and provides holistic supports to voucher holders.</p>	<p>Establish a counseling program by December 2024. Reach out to landlords in target areas by June 2025.</p>	<p>Apartment complexes east of Atlantic Boulevard and north of the railroad track</p>	<p>Encourage the County to increase Housing Choice Vouchers by at least 5 units annually</p>
	<p>Research and pursue a homesharing program, including research and coordination with non-profit and other organizations to assist with matching tenants with existing homeowners.</p>	<p>Contact GCCOG's list of Community Based Organizations (CBOs) by December 2024. Work with the City's Social Services Coordinators and City Committees to gather interested participants by June 2025</p>	<p>Citywide</p>	<p>Assist CBOs to advertise at least 5 homesharing opportunities per year starting in December 2025</p>
Program 1.3 - ADUs	<p>Update the Zoning Code to comply with State requirements for ADUs, including AB 2221 and SB 897</p>	<p>End of 2023</p>	<p>Single-family residential neighborhoods</p>	<p>Facilitate construction of 16 ADUs between 2021 and 2029; aim to achieve 80 percent of the ADUs in single-family neighborhoods.</p>
	<p>Update the Zoning Code to comply with State requirements for ADUs, including AB 2221 and SB 897</p>	<p>End of 2024</p>		
	<p>Develop an information sheet/brochure on ADUs, including building requirements and the permitting process, that may be given to interested property owners and kept at the Planning/Community Development Department. This information should also be included on the City website</p>			



Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	Develop and include a Fair Housing Factsheet, especially on Source of Income protection (i.e., use of public subsidies such as Housing Choice Vouchers for housing payments) in the ADU application packet.			
	Develop incentives to encourage development of ADUs, including financial assistance (from state programs if available) to assist lower income homeowners with construction, among others.			
Program 2.1 – First Time Homebuyer 2.0	Update City website to provide a link to California Housing Finance Agency (CalHFA) homebuyer assistance programs, as well as to HOP offered by LACDA	End of 2023	Advertisement Citywide; Modelo SP area	Provide first-time homebuyer assistance to 94 households through development of the Modelo Specific Plan (85 households) and Rosewood Village Specific Plan (9 households) through 2029.
	Partner with the City's Library Social Services Division to have information about the First Time Homebuyer 2.0 program available at the library and community centers.	Beginning in 2024 and annually thereafter		
	Pursue funding from State and federal programs to provide homebuyer assistance to lower and moderate income households.			
Program 3.1 – Mixed-Use Land Uses	As part of the General Plan update, develop objective design standards for the City's mixed-use land use areas	End of 2023	Atlantic and Washington Boulevard proposed Mixed-Use General Plan Land Use areas	Pursue development of 300 mixed use residential units.
	The City will contact developers in the area to inform them of potential opportunity sites, the established development standards, and other pertinent information. The City may also publish information online and at City Hall.	Annually		

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
Program 3.2 – Zoning Ordinance Amendments	Various amendments needed to comply with recent changes in State law and/or remove subjective language in the Zoning Ordinance	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Facilitate the development of 77 lower income units; aim to achieve 40 percent of the units for special needs households.
Program 3.3 – Lot Consolidation	As part of the Zoning Ordinance update, establish additional incentives for lot consolidation	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Notify housing developers during the planning period. Create six (6) developable sites.
	Notify housing developers of development incentives and opportunities for lot consolidation.	Twice during the planning period		
	Using the 6th Cycle Housing Element’s sites inventory, consolidate City-owned parcels to create developable sites	By the end of 2025		
Program 3.4 – Streamlined Processing	Facilitate ministerial approvals for lot splits in the R-1 zone, consistent with SB 9.	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Facilitate the development of 77 lower income units; aim to achieve 40 percent of the units for special needs households.
	Continue to monitor permit processing times and investigate ways to streamline the process. Prioritize the review of projects that include affordable housing units.	Annually		
Program 3.5 – Incentives for Affordable Units for Large and Multigenerational Households	Establish additional incentives and/or development regulations to promote the development of rental and ownership housing with three or more bedrooms.	Zoning Ordinance Update by end of 2024	Citywide	Pursue development of 77 lower income housing units.
	To increase the number of affordable multi-bedroom units to accommodate larger low-income families, the City will pursue affordable housing for larger and multigenerational households using City-owned properties.	Annually		

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	Explore options for larger units with interested developers and property owners			
<b>Place Based Strategies for Neighborhood Revitalization</b>				
AFFH Environmental Justice	New Environmental Justice Element policies addressing environmental conditions for new/rehabilitated housing will be applied to the sites in the Housing Element’s inventory. These policies can help with issues of freeway and truck traffic in and around the City as well as industrial and commercial manufacturing land uses within Commerce.	Upon adoption of the City’s Environmental Justice Element.	Citywide	Apply for at least one funding program
	Apply for and utilize cap and trade program funds from the Greenhouse Gas Reduction Fund (GGRF) for efforts such as tree planting and restoration, home energy efficiency, zero emission and plug-in hybrid vehicles, and affordable housing.	When program funds are available	Citywide	
	<u>Include Capital Improvement Projects that provide green buffers between residential/mixed uses and heavy industrial uses, high-traffic roads, railyards and freeways.</u>	<u>Annual CIP budget review</u>	<u>Mixed-use corridors along Washington Blvd, Atlantic Blvd.</u>	<u>One green buffer project annually</u>
	<u>Partner with organizations, entities, property owners of industrial and commercial spaces for community use (neighborhood group meetings, workshops, etc)</u>	<u>Annually</u>	<u>Industrial and Commercial Buildings</u>	<u>In association with the Library’s Social Services Coordinators, develop a list of available meeting spaces by January 2025.</u>
	<u>Utilize City-owned vacant and underutilized lands, (parking lots, etc) for community events, such as pop-up activities.</u>	<u>Annually</u>	<u>Housing Element Sites Inventory</u>	<u>Work with Community Services and Social Services Division to develop list of potential community pop-up events. Starting in 2025, hold at least 2 community events each year.</u>

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	<p><u>Identify available land (or acquire use of the land) for urban farms and community gardens (civic spaces, parking lots, vacant plots, rights-of-ways, etc.)</u></p>	<p><u>Using the Housing Element Sites Inventory, identify sites by end of 2024. Open first community garden by July 2025</u></p>	<p><u>Residential or mixed use neighborhoods</u></p>	<p><u>Establish two community gardens by 2028</u></p>
<p>Program 4.2 – Neighborhood Fix Up Program</p>	<p>Create informational brochures about the Neighborhood Fix-Up Program to have available at City Hall, other public locations and on the City website.</p>	<p>By the end of 2025</p>	<p>Citywide <u>with priority in Bandini neighborhood</u></p>	<p>During the planning period, assist 100 households with Neighborhood Fix-Up Program</p>
<p><u>AFFH Action</u></p>	<p><u>Continue to build on Atlantic Boulevard’s “downtown” by attracting locally-based, smaller scale vendor or artist businesses for entertainment and retail opportunities</u></p>	<p><u>Ongoing</u></p>	<p><u>Atlantic Blvd Mixed Use areas</u></p>	<p><u>Adding five new businesses by 2029</u></p>
<p><u>AFFH Action</u></p>	<p><u>Allocate funding to pursue residential street improvements, lighting projects and other community improvements in existing residential neighborhoods.</u></p>	<p><u>Annually</u></p>	<p><u>Citywide; Ayers and Darwell neighborhoods for transportation improvement projects</u></p>	<p><u>Pursue 8 improvement projects over the eight-year planning period.</u></p>
<p><b>Tenant Protection and Anti-Displacement</b></p>				
<p>Program 1.1: Adequate Sites for RHNA and No Net Loss</p>	<p>Complete redesignation of City-owned nonvacant sites for residential mixed use development, adequate to accommodate the remaining 76 units</p> <p>Maintain and update an inventory of the available sites for residential development and make it available on City website.</p> <p>Comply with SB 166. Develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863</p>	<p>General Plan Update by end of 2023; Zoning Code update by end of 2024.</p> <p>Annually</p> <p>End of 2024</p>	<p>Citywide</p>	<p>Facilitate the development of 247 units, consistent with the RHNA</p>

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	Issue Requests for Proposal to solicit affordable housing development on the City-owned sites identified in the Sites Inventory.	July 2025		
Program 1.2: Replacement Housing	Update the Zoning Code to address the replacement requirements.	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Achieve 100 percent replacement of demolished affordable units.
Program 1.4: ELI and Special Needs Housing	Establish incentives and appropriate development standards that can be implemented to encourage development of housing for lower income households	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Facilitate the development of 77 lower income units; aim to achieve 40 percent of the units for special needs households.
	Utilize City-owned sites to meet the housing needs of lower income households	Planning period		
Program 1.5: Alternative Housing Models	Establish incentives and appropriate development standards that can be implemented to encourage development of alternative housing models.	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	
Program 4.3 – CDBG Home Preservation Grant Program	Promote the Neighborhood Fix-Up program on non-traditional media (such as Facebook and Instagram).	2021-2029	CT 5323.03 has the highest percentage of overcrowding and renter cost burden	Assist 40 households
Program 4.4 – Monitor and Preserve Affordable Housing	When the City receives notice of a potential conversion of the federally assisted units, contact the property owners to pursue options to preserve these units as affordable housing. s.	2021-2029	Citywide	Preserve 235 existing affordable units.
	All dwelling units that receive public assistance in the City (including rehabilitation assistance and land write-down projects) shall continue to have affordable housing agreements filed with the land to ensure the long-term affordability of the units.			

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### Quantified Objectives

For the 2021-2029 Housing Element planning period, the City has established the following quantified objectives.

**Table 5-2: Quantified Objectives**

	Extremely Low	Very Low	Low	Moderate	Above Moderate
New Construction	27	28	22	39	131
Rehabilitation	20	<del>60</del> <u>50</u>	<del>50</del> <u>60</u>	<u>10</u>	<u>10</u>
Conservation	<del>117</del> <u>177</u>	<del>118</del> <u>177</u>	0	0	0

# APPENDIX A: PUBLIC OUTREACH

## Overview

This Appendix contains information on the various public outreach efforts conducted during preparation of the 2023-2031 Housing Element.

## Stakeholder Contact List

Table A-1 shows the stakeholder contact list used by the City for the General Plan Update (GPU), including the Housing Element. The table shows the name of the organization, their location and the organization’s area of focus.

**Table A-1: Commerce Stakeholder Contact List**

Company/Organization	City	Elderly/ Seniors	Persons Experiencing Homelessness	Families (large families, female headed families)	Persons with disabilities	Persons with developmental disabilities	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
Meta Housing Corporation	Los Angeles									x	
Heritage Housing Partners	Pasadena									x	
Habitat for Humanity - Greater LA	Bellflower									x	
Century Housing Corporation	Culver City									x	
Mercy Housing	Los Angeles									x	
National Community Renaissance of California (National CORE)	Rancho Cucamonga									x	
Amcal Housing	Agoura Hills									x	
Bridge Housing	Los Angeles									x	
City Ventures	Irvine										x
Abundant Housing Los Angeles											
Abundant Housing Los Angeles											
Abundant Housing Los Angeles											



<b>Company/Organization</b>	<b>City</b>	<b>Elderly/ Seniors</b>	<b>Persons Experiencing Homelessness</b>	<b>Families (large families, female headed families)</b>	<b>Persons with disabilities</b>	<b>Persons with developmental disabilities</b>	<b>Lower income households</b>	<b>Spanish speaking residents</b>	<b>Drugs/alcohol services/rehab</b>	<b>Affordable Developer</b>	<b>Market Rate Developer</b>
Easter Seals Society of Southern California	Whittier	X			X	X					
Housing Rights Center	Los Angeles										
Shelter's Right Hand	Whittier			X							
LA ROSAH											
East Yards											
Hathaway Sycamores Child and Family Services	Commerce			x							
Telacu	Los Angeles									x	
East Yard Communities For Environmental Justice	Commerce										
Heart of Compassion Distribution Food Bank	Montebello		x				x				
Community Legal Aid SoCal.	Santa Ana	X	X	X							
Veterans of Foreign Wars	Santa Fe Springs										
California Association of Realtors	Los Angeles										
Whittier Union High School District	Whittier			X							
Los Angeles Commission on Assaults Against Women, Intervention and Prevention Services (Peace over violence)	Los Angeles	X		X	X						
Department of Rehabilitation, State of California	Los Angeles				X	X					
Southern California Rehabilitation Services (S.C.R.S.)	Downey				X	X					
Southeast Area Social Services Funding Authority (SASSFA)	Santa Fe Springs	X									
Community Legal Aid SoCal.	Santa Ana	X	X	X							

Company/Organization	City	Elderly/ Seniors	Persons Experiencing Homelessness	Families (large families, female headed families)	Persons with disabilities	Persons with developmental disabilities	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
Veterans of Foreign Wars	Santa Fe Springs										
California Association of Realtors	Los Angeles										
Penny Lane	Commerce		X	X			X				
Bienvenidos Family Services	Los Angeles			x				x			
Department of Children and Family Services	Commerce			x							
Department of Public Social Services Belvedere Office	Los Angeles			x							
Los Angeles Unified School District	Los Angeles			x							
Montebello Unified Sch District	Commerce			x							
AltaMed Health Services Corp	Commerce										
Immediate Medical Center	Commerce										
U.S. HealthWorks Medical Group	Commerce										
Concentra Urgent Care	Commerce										
Health Care Services Department	Commerce										
Enki Health and Research Systems Inc.	Commerce										
NARCOTICS PREVENTION ASSOCIATION	Los Angeles								x		
Siempre Viva	Los Angeles								x		
C.I.H. SERVICIOS GENERALES de A.A.	Commerce								x		
Commerce City Senior Citizens	Commerce	x									
East Los Angeles Community Youth Center	Los Angeles			x							
Eastmont Seventh Day Adventist Spanish Church - Food Distribution Center	Los Angeles		x				x				
Food Distribution Center - Door of Hope Ministries	Los Angeles		x				x				

<b>Company/Organization</b> City of Commerce Community Center - Food Distribution Center	<b>City</b> Commerce	<b>Elderly/ Seniors</b>	<b>Persons Experiencing Homelessness</b>	<b>Families (large families, female headed families)</b>	<b>Persons with disabilities</b>	<b>Persons with developmental disabilities</b>	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
			x				x				

**Outreach Materials, Presentations and Summaries**

The following pages contain the outreach materials, presentations and summaries during the General Plan Outreach process.



# Pop-Up Workshop Summary



# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### I. Introduction

#### Purpose and Objectives

On Saturday, September 8, 2018, the City of Commerce hosted a pop-up workshop to launch its General Plan Update and receive initial feedback from the community. MIG assisted the City in the design and facilitation of the event that took place on Farrar Street at Atlantic Boulevard and attracted nearly 50 participants of all ages.

The pop-up workshop was an opportunity to showcase potential improvements to Commerce's built environment and streetscape and spark the imagination of the local community to visualize possibilities for the future of Commerce. The workshop was designed as an interactive activity, allowing participants to share their thoughts, ideas, and preferences with the project team through a variety of engagement tools.

The objectives for the demonstration pop-up workshop were to:

- Create a celebratory and interactive environment to engage and educate community members about the General Plan Update
- Demonstrate potential for vitality and attraction of investment and business
- Demonstrate a contextualized visualization of potential improvements to the street that will improve the area's quality of life for residents, business owners, employees, and visitors
- Confirm framework for Atlantic Boulevard area improvements and inform community members about the relationship to the General Plan Update process and timeline



### Emerging Themes and Key Findings

Throughout the workshop and the various engagement activities several prominent themes emerged from the feedback provided by participants. Recommendations and ideas that received a lot of attention and high rankings throughout the different engagement activities were identified as emerging themes. These emerging themes indicate the community's priorities in terms of improving the quality of life in Commerce. As such they will help guide the development of the General Plan update.

- **Access to affordable and healthy food** - Many participants requested better access to a grocery store with healthy food options in Commerce. This request emerged as a key finding throughout many of the input tools and was one of the proposed improvements that received the most votes overall.
- **Increased retail and restaurant options** - Broadening the variety and number of restaurants and retail options on the main commercial streets in Commerce emerged as a priority for participants. Many identified Atlantic Boulevard as a preferred location for more restaurants as well as, to a lesser degree, Washington Boulevard. Several specific types of preferred retail services were identified by participants, including a grocery store, a bank and a drug store.
- **Enhanced green space and vegetation** - Many participants indicated the need for more green space and vegetation throughout the city. Providing a better connection to the natural environment, even through smaller interventions to the streetscape, was a key element in most participants' vision of the future for Commerce. Many envision a greener city with more bike and walking trails and more trees throughout the city.
- **New recreation facilities** - Creating new sports facilities as well as a dog park emerged as a preferred improvement for many of the workshop participants. They indicated that new opportunities for recreation and physical activity would help improve the quality of life in Commerce. This finding builds on participants' recognition that the city's parks and recreation facilities was one of its strongest assets.
- **Encouraging clean businesses** - Participants indicated the need to limit the location of heavy industrial businesses in Commerce and instead encourage clean and green businesses to locate in the city. The attraction of such businesses would help improve the environment in Commerce.



## II. Format and Methodology

The pop-up demonstration event was designed as an interactive environment where participants could arrive at any point during the event and stay as long as they wish. The activities organized at several different stations aimed to attract and engage participants of all ages and backgrounds, including families, youth, and seniors. All materials were translated to Spanish, and at least one bilingual Spanish speaker from MIG was in attendance. Participants were asked to check-in at the sign-in table to receive an event passbook and information about the General Plan Update and Specific Plan development.

The event was organized by station and each station covered a different topic based on the various types of improvements and investment strategies that could be included in the General Plan. Participants were encouraged to visit every location to receive a passbook stamp and a small prize. The passbook helped guide participants through the activities and incorporate the community's input into contemplated changes along Atlantic Boulevard and the General Plan in general.

When a participant completed all activities, she/he turned in her/his passbook and received a raffle ticket for an opportunity to win a grand prize. Prizes of increasing value were raffled off throughout intervals of the day—attracting and maintaining the participation of more residents.

The event was designed to be festive with vibrant displays and signage. Each station included the following elements:

- Staged activity demonstrating potential improvements, interventions, strategies
- Displays to provide education about how these ideas contribute to and enhance a community
- Engagement tools to solicit input from the community regarding preferences for the ideas presented

Various engagement tools were available throughout the event. In most cases, participants were asked to use dot stickers to identify their preferences between different types of improvements. They were also invited to share their own ideas for improvements by either writing or drawing their vision for the future of Commerce. Each activity was staffed by members of the project team to encourage participants to provide input, provide assistance if needed, and answer any questions that community members had.





# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### III. Summary of Community Input

Participants were encouraged to share their thoughts and ideas about the future of Commerce and what they would like to see improved or changed in the city as it evolves over the next decades. Community input was collected on a variety of different topics relating to Commerce’s built environment and community amenities. The feedback collected through these interactive activities is summarized below by topic. Since participants were encouraged to select their top-two or -three preferred answer choices, the results of the dot-activities presented below should not be interpreted as percentages of total participants but, instead, should be understood as percentages of total dots.

The first input board asked participants where they live, work, and play in Commerce. Although not all participants answered this question, figure 1 below demonstrates that the majority of workshop participants were Commerce residents representing all residential neighborhoods of the city.

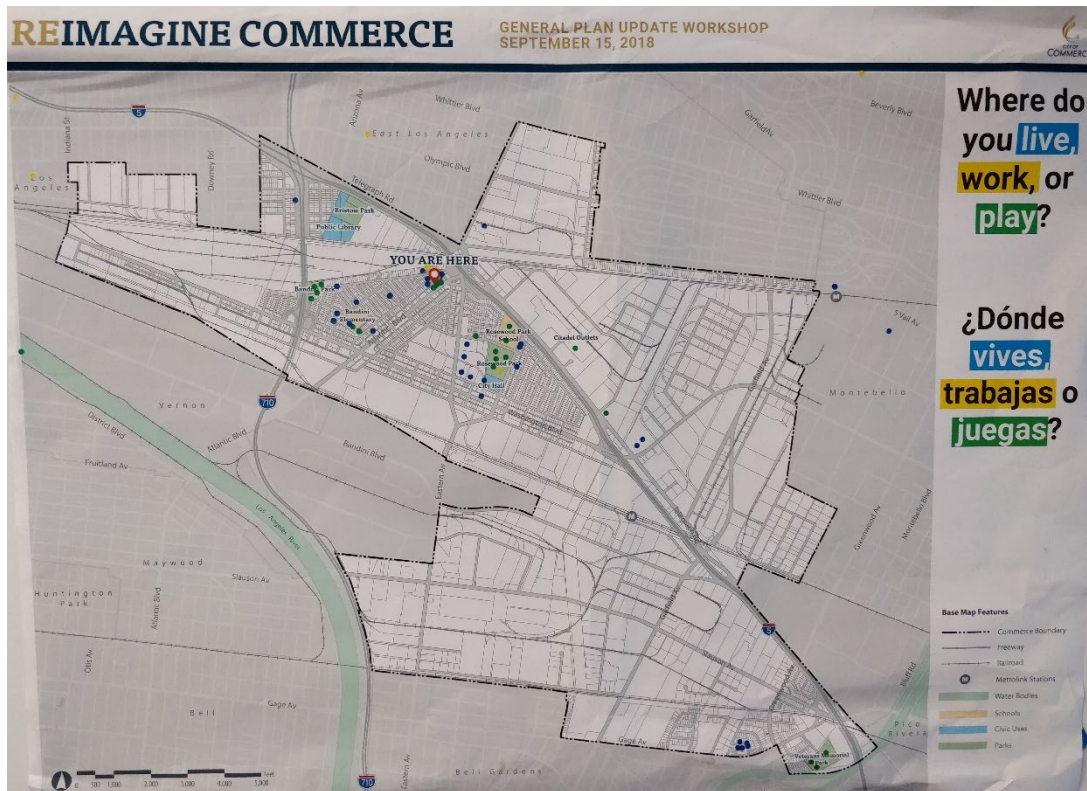


Figure 1: Where do you live, work, or play?

# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### What would you like to see more of in Commerce?

Participants were asked to identify what types of improvements or new amenities they would like to see more of in Commerce. Grocery stores received the most number of votes from participants, who were allowed to select up to three answer choices. Other preferences identified by participants included, in order of preference, more places to eat and shop, more housing options and plazas and open spaces. Other answer choices provided by participants included recommendations for specific types of grocery stores, such as Trader Joe's (identified by over 10 participants), as well as a desire to bring back the small town feel to Commerce. One participant requested adding a stop on the Metrolink shuttle line to better serve the community.

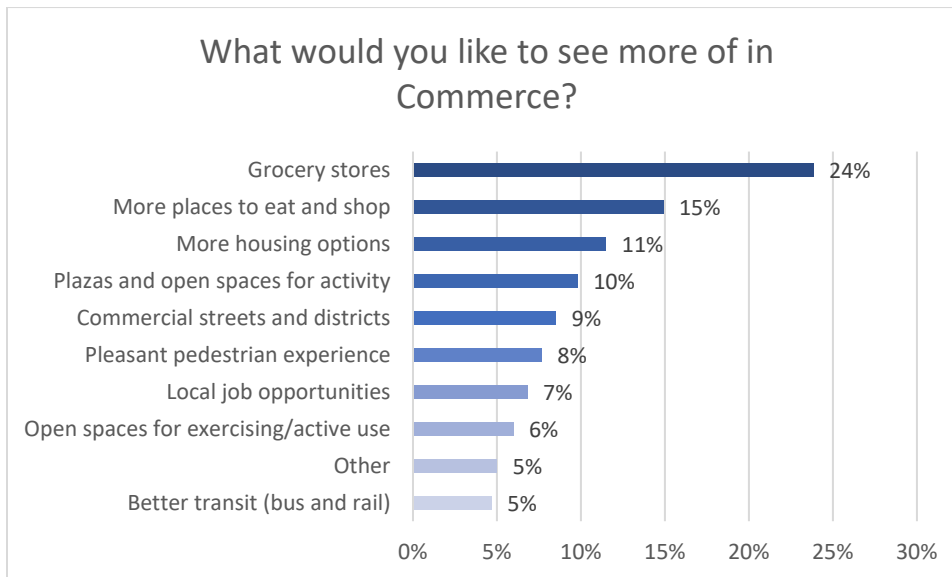


Table 1: What would you like to see more of in Commerce?



# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### What should Commerce prioritize to improve the environment?

Participants identified encouraging clean and green businesses as the top priority for Commerce to improve the environment. Other strategies, ranked as second-tier priorities by participants, included reducing noise and pollution by businesses and addressing vehicle pollution.



A recommendation provided by a participant in the “other” category encouraging the city to add more trees received many votes from participants. Combined with the answer choice “plant sustainable landscaping,” this recommendation would rank second in terms of priorities for improving the environment in Commerce. Other write-in answers provided by participants included providing free wifi for residents, providing public recycling bins, and improving the bus experience.

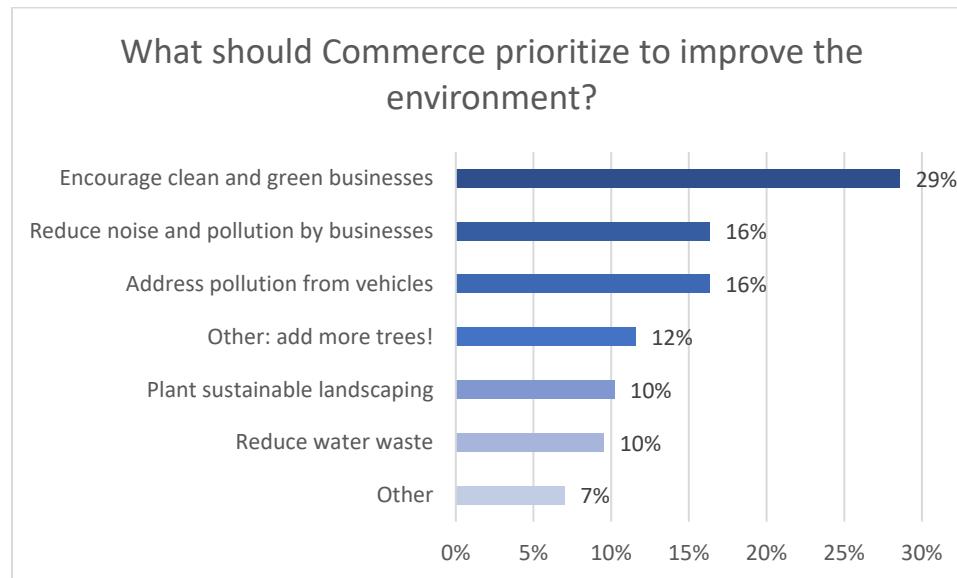


Table 2: What should Commerce prioritize to improve the environment?



# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### How can Commerce become a healthier place?

The top strategy identified by participants to help Commerce become a healthier place is encouraging healthy food markets. The two second-most preferred strategies were limiting the locations of heavy industrial business and reducing truck traffic near residential areas. Other recommendations provided by participants included increased beautification near the Veteran’s memorial park, creating a farmer’s market and redirecting truck traffic off Washington, with clearer signs.

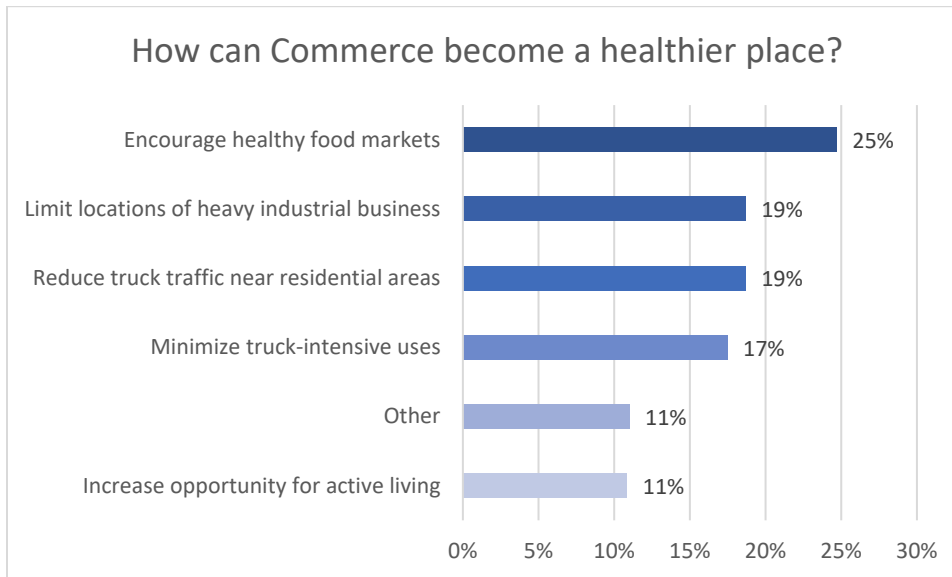


Table 3: How can Commerce become a healthier place?



# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### How can we improve our parks, recreation facilities, and open space so people can lead healthier lives?

The two preferred improvements to parks, recreation facilities and open space in Commerce were creating more walking and bike trails and improving existing facilities. Creating a high school and expanding the library was identified by several participants as another improvement to Commerce’s quality of life.

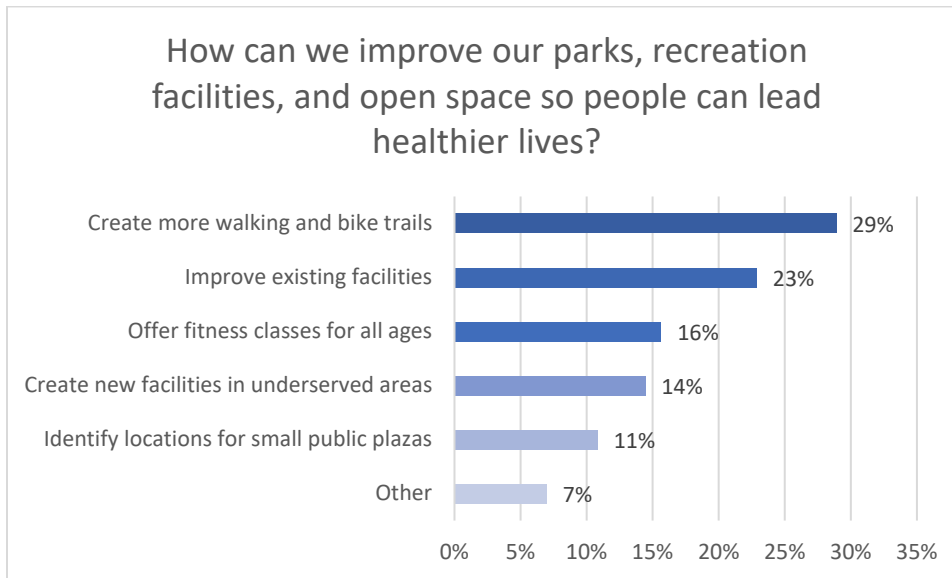


Table 4: How can we improve our parks, recreation facilities, and open space so people can lead healthier lives?



# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### Commerce should provide housing for...

The top two populations that Commerce should provide more housing for, according to workshop participants, are young homeowners and large families. Housing for low-income residents and seniors were identified as a lower priority for Commerce.

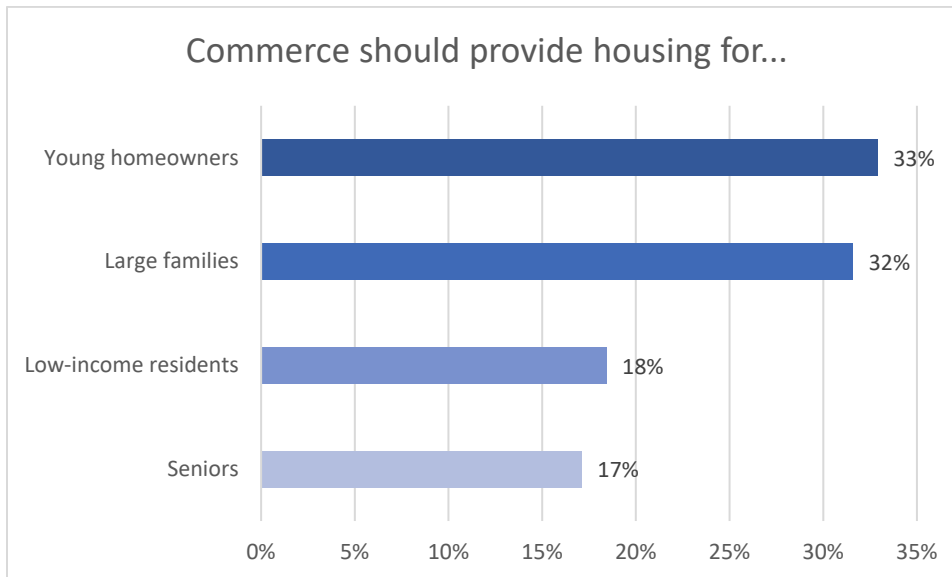


Table 5: Commerce should provide housing for...

### What kind of improvements would you like to see to Atlantic Blvd?

Increasing the number and variety of restaurants as well as providing opportunities for entertainment were the top two preferred improvements that participants would like to see on Atlantic Blvd. Another improvement that received a significant amount of votes from participants was the creation of a dog park. This recommendation was provided by a participant as a write-in and received the third-most votes overall. Creating public plazas, gathering spaces, and pleasant pedestrian experiences were other improvements identified by many participants for Atlantic Blvd. Participants also recommended that additional amenities and services be available on Atlantic Blvd, such as a bank, a super market, and a drug store.





# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

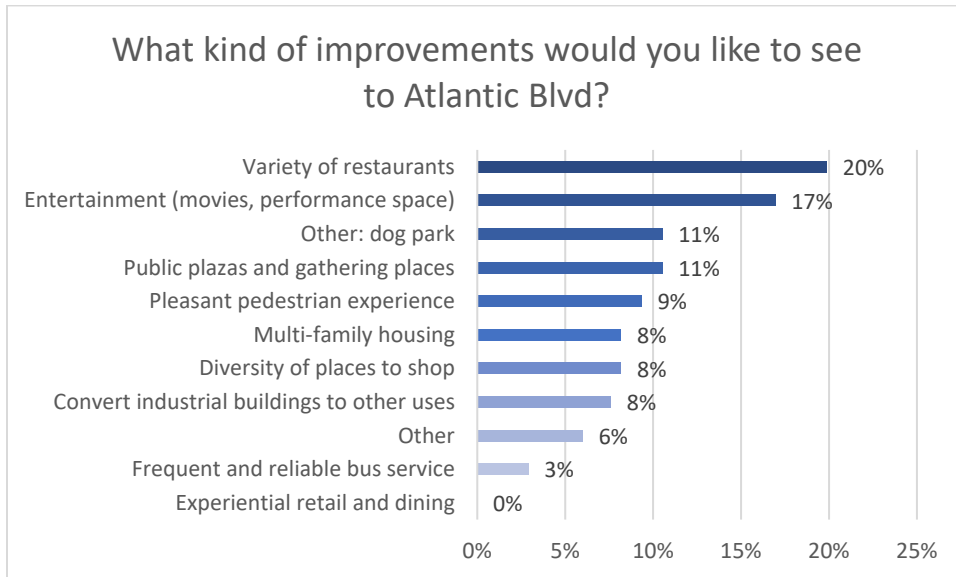


Table 6: What kind of improvements would you like to see to Atlantic Blvd?

## What kind of improvements would you like to see on Washington Blvd

Similar to the findings for Atlantic Blvd, many participants would like to see a larger variety of restaurants on Washington Blvd. However, other findings differed as participants identified different types of uses for Washington Blvd than those identified for Atlantic. Furthermore, no clear favorites came out of the results with votes almost evenly distributed among several uses, including converting industrial buildings to other uses, providing a diversity of places to shop, and creating pleasant pedestrian experience. Other amenities and improvements proposed by participants included a high school, a nature trail or garden and a drug store.



# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

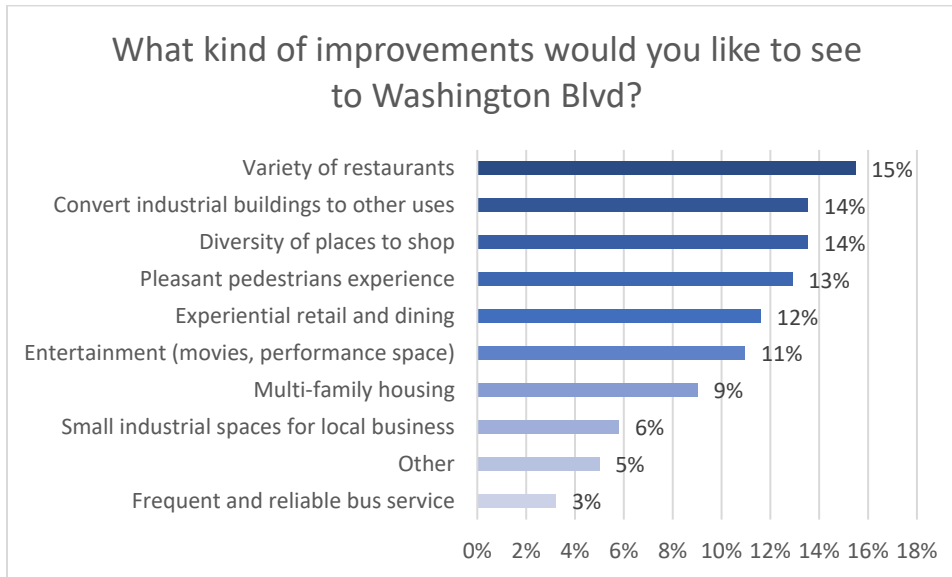


Table 7: What kind of improvements would you like to see to Washington Blvd?

## What do you like most about Commerce?

Participants were asked to share what they most about Commerce in an open-ended question where participants were encouraged to write their answers. The most frequently mentioned local assets and benefits of living in Commerce were its many activities, especially for kids, and its parks and recreation facilities. Each asset was mentioned by nearly a third and a quarter of participants, respectively. All answers provided by participants fell into the following categories, organized in order of importance:

- Activities, especially for kids
- Parks and recreation facilities
- City services
- Community and local culture
- Transportation
- Retail options
- Representation by elected officials





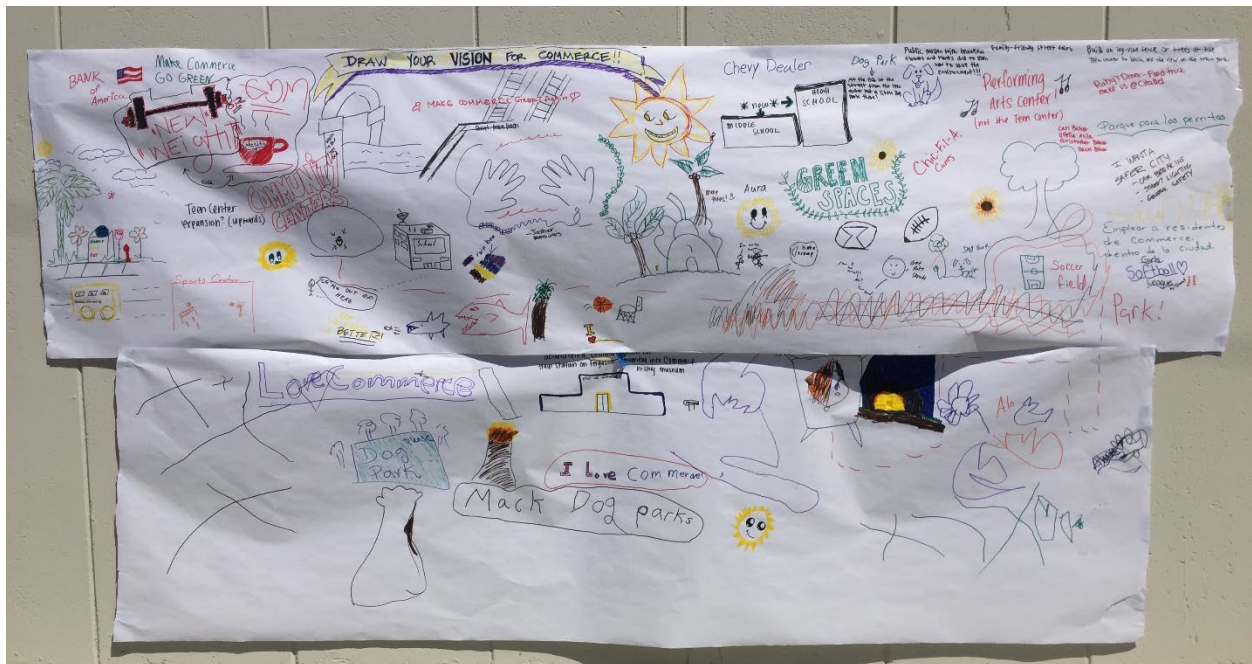
# REIMAGINE COMMERCE

## GENERAL PLAN UPDATE

### Your vision for Commerce

Workshop participants were asked to envision Commerce's future and share what that vision would look like through drawings. Several key improvements emerged as priorities through this drawing exercise, with over half of the participants identifying more parks, green space and sports facilities in their vision for Commerce's future. Participants' vision for Commerce included the following key elements, listed in order of importance based on the number of times they were mentioned by participants:

- More parks and green space
- New sports facilities
- More retail options
- New or improved community centers
- New schools
- Better transportation
- More community events, especially family-friendly
- Improved neighborhood safety
- Local employment opportunities



## **IV. Next Steps**

ReImagine Commerce  
**General Plan Advisory Committee**  
Meeting #1

December 19, 2018

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**SUMMARY**

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**Introduction**

On Wednesday, December 19, 2019 the City convened the first meeting of General Plan Advisory Committee. The purpose of the meeting was to provide the Committee with an overview of the process to update the city's General Plan, review the charge of the committee, and update on the work to date. Matt Marquez, Deputy Director of Development Services, welcomed the meeting and introduced Laura Stetson and Esmeralda García from MIG. He described that the city selected the consulting firm to lead the General Plan update.

The following is a summary of the Committee's discussion.

**Outcomes**

Laura and Esmeralda lead a round of self-introductions and asked committee members share their desired outcomes from the process.

- Commerce is ready for change and there are great benefits that can come from this.
- Best practices from other places will greatly inform how the community provides input on the future vision.
- The freeways and rail yards pose a challenge and this needs to be considered in the development of the General Plan update.
- Parks are important in our community and we need to understand how they are changing.
- The process needs to involve youth; they want to help shape future.

- It's important to see youth contribute ideas
- The long-range vision should be to see Commerce prosper.

## Project Updates

The consultant team provided a brief presentation summarizing the work completed to date. This included the results of the first community workshop and planning strategies for Atlantic Boulevard, Washington Boulevard, and the Housing Opportunity Overlay. Committee members asked the following questions and comments.

- Will the team host pop-up demonstrations in other parts of the city? It would be important to have events throughout the city and provide more publicity so there is a great turn out.
- Does the team plan to coordinate with Bicycle and Pedestrian Master Plan committee?
- How will warehouses be addressed?
- We need to plan for more housing.
- Is the proposed Gold Line alternative going to be unground? This will help reduce congestion?

The consultant team facilitated a discussion to get feedback into the planning strategies for Atlantic Boulevard, Washington Boulevard, and the Housing Opportunity Overlay. These were shared with the City Council and Planning Commission and feedback from the GPAC is the next step in the process. The committee provided the following comments.

- Survey business community to see what types of activities and uses they would like to see after 6:00 p.m. The team can assess what types of businesses would address these needs.
- Consider amenities for employees to stay a little longer after hours. Places where they can dine, go out for drinks, etc.
- Many businesses would like amenities for all employees, especially when off-shift.
- There is a need to provide housing opportunities for the local workforce.
- There will always be traffic and parking impacts. Look at ideas to address this. For example the residents near Steven's Stake House have issues with patrons parking in the neighborhood.
- The ideas for Atlantic Boulevard area a good vision.

- Improve local transit to improve connections.
- Create more walkable places
- Add more landscaping and improve the tree canopy. Trees are also a good way to improve the air quality.
- 
- Plan for housing that meets the needs of the younger generation. Look at these current trends.
- New housing should include childcare centers.
- The way workers use office space has evolved and current trends include on site amenities and a different environment.
- Consider the WeWork model when planning for office space.
- Co-housing is a good option.
- Like the co-housing idea
- Denser development is a good option and should be considered as an opportunity to address housing needs. Single family homes will be too expensive.
- There is little access to healthy food. Consider a food desert grant (Federally subsidized) to attract a supermarket.
- Housing for young adults wanting to move back to Commerce is needed.
- Look at Millennials as we shape our new vision.
- Commerce has fallen behind in residential development.
- Arrange a site visit and tour of places to inspire our vision and identify opportunities.
- Provide examples from aboard.
- Undergrounding utilities will improve aesthetics.
- Prioritize a supermarket. The city should look for incentives such as purchasing a property and leasing it (almost cost-free) to a grocery store.
- Make sure adequate parking is available.

The team discussed a standing time for the GPAC to meet over the next year. The group agreed on the 4<sup>th</sup> Tuesday of the month. The committee will take a break in January and begin convene on February 26, 2019 at 6:00 p.m.

## General Plan Advisory Committee

Meeting #6

July 30, 2019

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### SUMMARY

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#### Introduction

On Tuesday, July 30<sup>th</sup>, 2019 the City convened the sixth meeting of the General Plan Advisory Committee (GPAC). The focus of the meeting was to elicit input about new land uses in Commerce.

#### Previous Meeting Recap

The comment regarding motels is general.

- *The group discussed that motels along Atlantic Boulevard are an eyesore and undesirable.*

The following is a summary of the Committee's discussion.

#### Areas for Opportunity

Ms. García introduced an aerial map of Commerce displaying assets and major corridors, an updated map based upon feedback from June's meeting of the GPAC, and a legend depicting uses that resulted from the community visual survey that was distributed during the first phase of community engagement. She facilitated a discussion to gather ideas about new uses the GPAC members would like to see in different parts of the city and exactly where they should be.

GPAC members had the following comments:

- Address existing issues in the General Plan.
  - Homelessness is increasing annually in the region and the Plan should consider how to provide for that population.
  - Parking spaces, both on and off-street, for residents are a major need throughout Commerce.
  - Amenities for day workers vs. amenities for permanent residents are disproportionate in favor of day workers who do not live in Commerce.
- Ensure careful planning if I-710 freeway is improved.
  - Provide site(s) for relocation of displaced residents.
  - Consider community benefits as a development requirement.
- Consider proposed Metro light-rail station as a unique opportunity for a vibrant plan area.
- Consider a transit-oriented development (TOD) near the proposed Metro light-rail station.
  - Maximize the use of land near the Metro station.
  - Balance parking availability between residents and transit users. Provide parking as a premium for residents and consider shared parking options.
  - Make the TOD equitable and accessible for all.
- Enhance the Target shopping center and leverage success of food trucks and local businesses.
- Consider diverse types of business.
  - Some industrial areas could be converted to other land uses.
  - Commerce is currently the #3 port city in the U.S.
- Add a life skills center in Commerce.
- Provide better connections within the Bristow neighborhood.
  - Create bike corridors.
- Provide homeless shelter/center services in the Veteran's Park neighborhood.

### **Action Items/Next Steps**

- The GPAC members can email comments on the previous meeting summary to General Plan team by August 5, 2019.

The team reminded the committee members that the next meeting will take place on August 27, 2019 at 6:00 p.m.





Community Assets

- Aquarium Acuario
- Library Biblioteca
- Park Park
- School Escuela
- Senior Center Centro para Personas Mayores
- Proposed Eastside Gold Line Station Estación Propuesta

Opportunities

- Corridor Connections Conexiones de Corredor
- Utility Corridor Corredor de Servicios

0 500 1,000 2,000 Feet  
 Source: City of Commerce and Los Angeles County Department of Parks and Recreation, 2016

BIKE CORRIDOR CONNECT

SHARED AFFORDABLE HOUSING + POT. TO UP OVERFLOW

TOP EQUITIES

COMM. BENEFITS

RENT CONTROL POLICY + COMM LAND TRUST

LEARNING CENTER COMMUNITY COLLEGE SATELLITE - BLAC - OAK STATE - UCLA

HOMELESS SERVICES (Shelter, center) opt. 2

COMPROMISED AREA

OPPORTUNITY AREA

Existing Streets



## General Plan Advisory Committee

Meeting #7

August 27, 2019

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### SUMMARY

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#### Introduction

On Tuesday, August 27<sup>th</sup>, 2019, the City convened the seventh meeting of the General Plan Advisory Committee (GPAC). The focus of the meeting was to elicit input about the emerging vision and guiding principles for Commerce.

The following is a summary of the Committee's discussion.

#### Emerging Vision

Ms. García introduced Commerce's emerging vision and community values that incorporate the feedback from the GPAC and this summer's community engagement events. She facilitated a discussion to confirm the vision and guiding principles. The GPAC members provided a variety of comments on the overarching vision and provided ideas for consideration in the General Plan update.

#### Circulation and Connections

- Improve and strengthen transportation connections to from the southern (residential) side of Commerce to the area on the north (Citadel).
  - Consider constructing a pedestrian bridge from Ferguson Drive over the rail yard.
  - Improve mobility at Ferguson/Goodrich/Atlantic to address the bottle neck. This causes access and safety issues for the residents in the Ferguson neighborhood.
  - Plan intentional connections along Atlantic Boulevard, Telegraph Road, and Eastern Avenue for residents and visitors.

- Plan for increased traffic as a result of all proposed development projects.
- Reexamine and reestablish Goodrich Blvd's full connection into the Mix Master.
- Increase the amount of parking in residential areas.
- Consider shared parking programs in residential areas.

#### Housing

- Create more housing in Commerce.
- Make housing more affordable and stable.
- Emphasize affordability and stability
- Consider options to retrofit motels along Atlantic Boulevard, possibly for affordable housing or apartments for the homeless.

#### Economic Development

- Incorporate the daily workforce into the community fabric.
  - Incentivize workers to stay after 5 pm to shop.
  - Give workers a vested interest in Commerce's amenities and services.
- Bring a supermarket into Commerce.
- Balance support for Commerce's "legacy businesses" and new businesses.

#### Services

- Provide quality medical care for Commerce residents.
  - Build Commerce a medical facility.
- Look at the Altamed medical facilities as an example.
- Bring amenities into Commerce that engage and activate the local community.
- Provide more amenities after business hours.

#### Community Health

- Mandate and enforce healthy noise and pollution levels.
  - Consider making Commerce carbon neutral.
  - Plant more street trees that produce oxygen.
- Update and upgrade Commerce's local businesses.
  - Provide City-sponsored programs to help local businesses operate "cleaner and greener."
- Build community gardens in Commerce.

- Consider cooperative ownership models for Commerce businesses as a strategy to implement green practices while addressing the needs of community members in need.
  - Bring thrift shops into Commerce.
- Create innovative solutions to address issues related to community members experiencing homelessness.
  - Consider policies that partner with Commerce industrial businesses for using parking during non-business hours for community members residing in vehicles.
  - Provide services such as bathrooms.
- Consider available uncontaminated land for agricultural uses such as community gardens.

The group had a question regarding the planned improvements for the I-5 project, specifically the schedule. Staff will follow up with other departments to follow up with the group.

## **Closing**

Ms. García summarized the input provided during the meeting and informed the group that Committee would address the community benefits during the September meeting. In preparation she asked the group to think about the types of community benefits that will inform the General Plan Update.

She reminded the group that they can email comments on the previous meeting summary to General Plan team by September 2, 2019. The next meeting will take place on September 24<sup>th</sup>, 2019 at 6:00 p.m.

## **General Plan Advisory Committee**

### Meeting #8

September 24, 2019

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## **SUMMARY**

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### **Introduction**

On Tuesday, September 24<sup>th</sup>, 2019, the City convened the eighth meeting of the General Plan Advisory Committee (GPAC). The focus of the meeting was to elicit input about the draft vision for Commerce and potential community benefit.

The following is a summary of the Committee's discussion.

### **Draft Vision and Guiding Principles**

Ms. García introduced Commerce's draft vision and guiding principles that incorporate the feedback from the GPAC, the community survey, and this summer's community engagement events. She facilitated a discussion to confirm the vision and guiding principle components and explained that these drafts will lead to the vision statement and guiding principles. The GPAC members provided a variety of comments on the overarching vision and guiding principle statements and provided ideas for consideration in the General Plan update.

- Ensure the vision has a consistent active voice
- The term "green" should be defined
- The statement regarding transportation network should improve air quality.
- Improving human health is important and the statement related to addressing noise and pollution should be bolder

## Community Benefits

### Landscaping

- Include trees that will oxygenate and provide canopy
- Use best environmental practices for public landscaping (non-harmful products and xeriscaping)
- Consider “green/living walls” in publicly visible spaces

### Plazas and Open Spaces

- Consider nontraditional seating areas in medians
- Use visual examples:
  - Pasadena Paseo
  - Portland mall - Multi-modal, active transportation

### Meeting Places

- Include meeting spaces on rooftops
- Require visible, welcoming privately owned public spaces

### Bikeways

- Require bikeway access to and from private developments

### Housing

- Provide affordable housing for both low- and middle-income residents, including workforce
  - Use community’s median income to determine respective goal amounts for affordability
  - Build cooperative housing for disabled and veteran residents

### Local Restaurants

- Allow small storefronts, pop-up businesses, and kiosks
- Add a coffee shop near the Metrolink stop/parking lot
- Use good examples:
  - Anaheim GardenWalk
  - Merkado—stalls for mom-and-pops with a shared commercial kitchen
- Encourage developer to implement programming

- Developer should contribute offsite amenities (commercial kitchen or open space) if unable to provide onsite

#### Parking

- New housing/dwelling units will increase the need for traffic and parking solutions
  - Consider bundled/shared parking requirements between developers. Use examples like New York.
  - Cars are projected to get smaller and smaller in the next ten years

#### Housing

- Create an accessory dwelling unit (ADU) policy

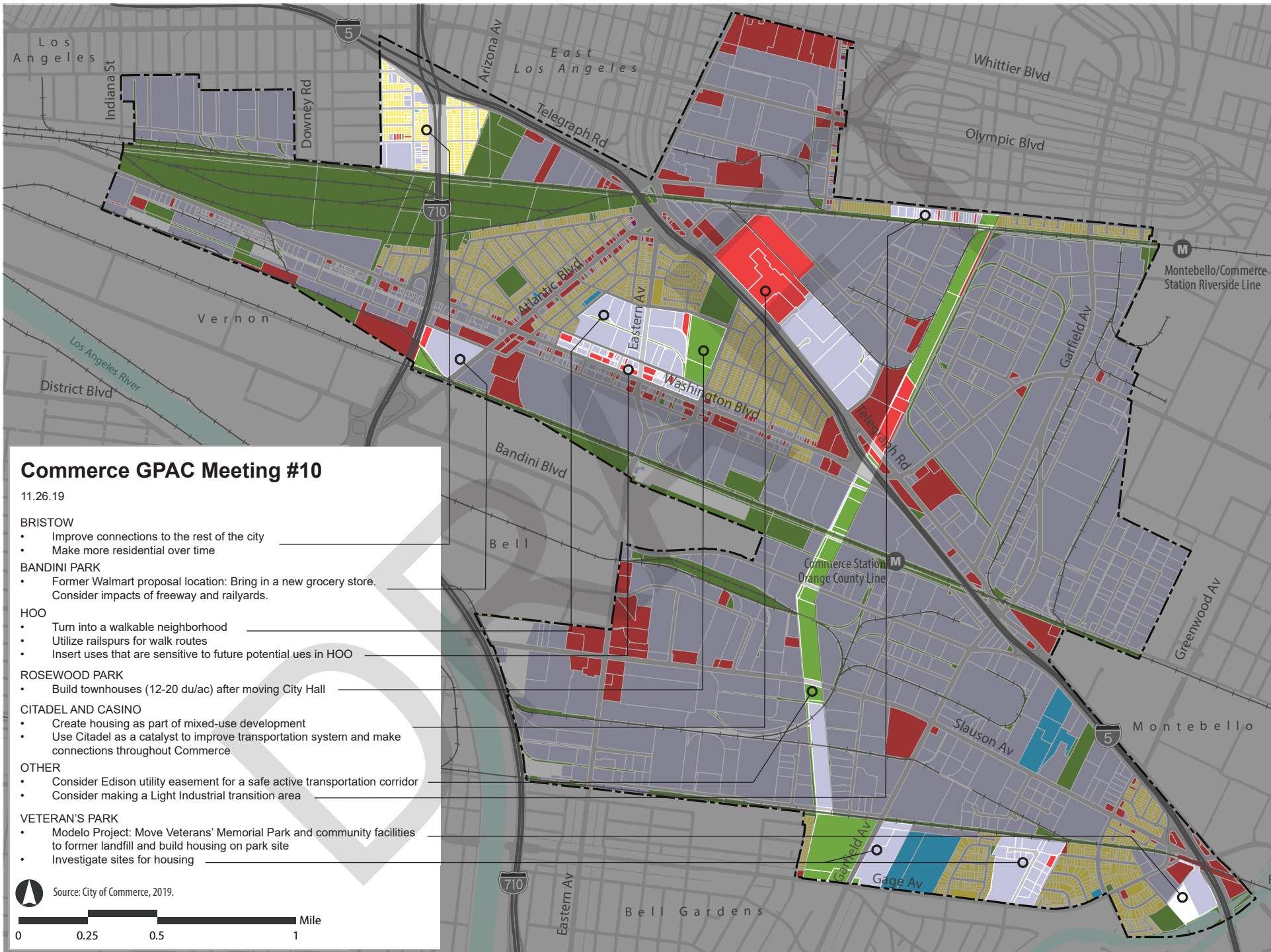
#### Railways

- Improve communication between residents and Union Pacific railway

### **Closing**

Ms. García summarized the input provided during the meeting and informed the group that Committee would discuss land use during the September meeting.

She reminded the group that they can email comments on the previous meeting summary to General Plan team by September 30, 2019. The next meeting will take place on October 22<sup>nd</sup>, 2019 at 6:00 p.m.



## Commerce GPAC Meeting #10

11.26.19

### BRISTOW

- Improve connections to the rest of the city
- Make more residential over time

### BANDINI PARK

- Former Walmart proposal location: Bring in a new grocery store.
- Consider impacts of freeway and railyards.

### HOO

- Turn into a walkable neighborhood
- Utilize railspurs for walk routes
- Insert uses that are sensitive to future potential uses in HOO

### ROSEWOOD PARK

- Build townhouses (12-20 du/ac) after moving City Hall

### CITADEL AND CASINO

- Create housing as part of mixed-use development
- Use Citadel as a catalyst to improve transportation system and make connections throughout Commerce

### OTHER

- Consider Edison utility easement for a safe active transportation corridor
- Consider making a Light Industrial transition area

### VETERAN'S PARK

- Modelo Project: Move Veterans' Memorial Park and community facilities to former landfill and build housing on park site
- Investigate sites for housing



Source: City of Commerce, 2019.







# City of Commerce Community Workshop

Housing Element Update November 17, 2022





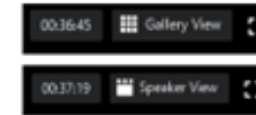
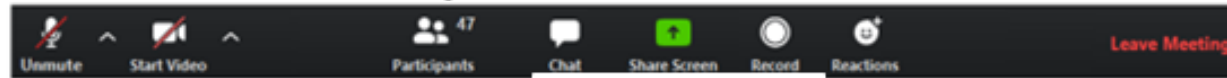
# Agenda

- Introductions and Welcome
- General Plan
  - Housing Element Overview
- Special Housing Needs
- Next Steps
- Share Your Thoughts

# Meeting Format and Zoom Tools

How to Use 

**Black menu bar at top or bottom of screen:**



## Audio

Please mute yourself when not speaking

## Video

## Participants

- See Others
- Rename Yourself (Name & Group/Agency Affiliation if applicable)
- Raise Hand (remember to lower after)

## View

Gallery/Speaker View of videos and screen share can be changed in top right corner

# Poll Question #1

**What special needs group does your organization represent?**

- Seniors
- Immigrants
- Low income households
- People experiencing homelessness
- People with disabilities
- Female-headed households
- Other

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s eventos y para dar su opinión!



OTHER (PLACE NOTE BELOW  
OTRO (COLOCAR NOTA ABAJO)

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What kind of improvements would you like to see on Blvd?

¿Cuales mejoras te gustarían ver en Blvd?

PICK YOUR TOP 3

What would you like to see more of?

¿Qué te gustaría ver más?

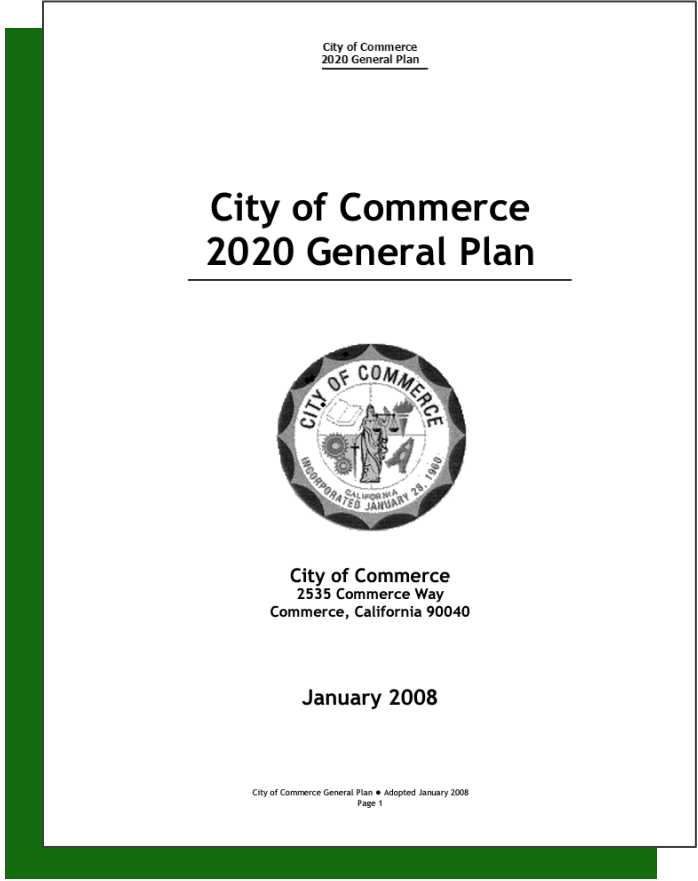
PICK YOUR TOP 3 | ELIGE TUS 3 MEJORES



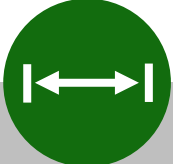
LOW-INCOME  
RESIDENTS

# General Plan Overview

# A General Plan is...



High-level policy document required by State law



Long-range in scope

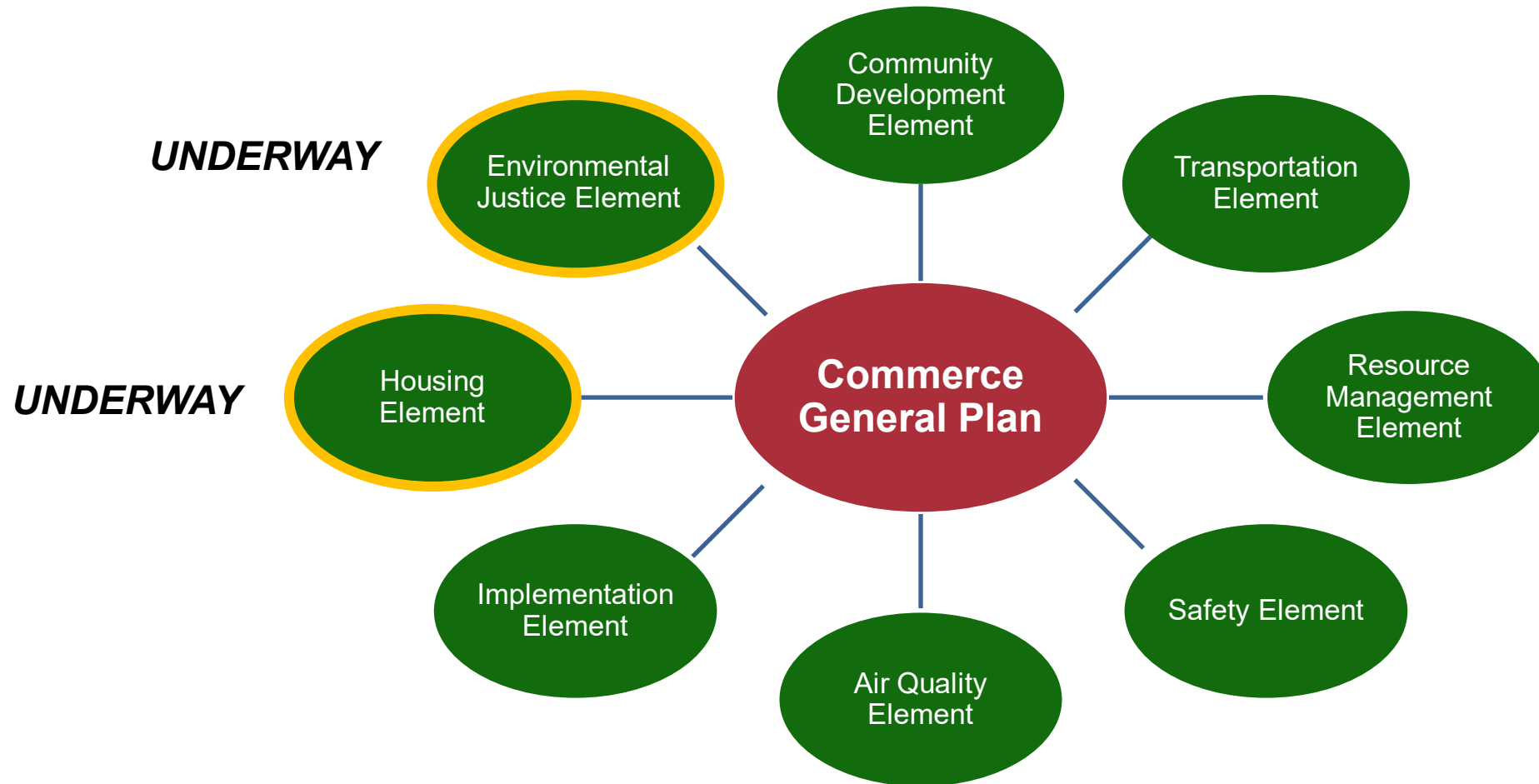


Blueprint for change over time

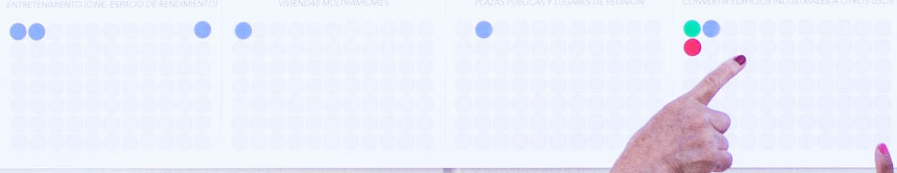


Focused on 15-20 years outlook

# General Plan Elements



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OTRO (COLOCAR NOTA ABAJO)

BIGGER HEBARY

## REIMAGINE COMMERCE

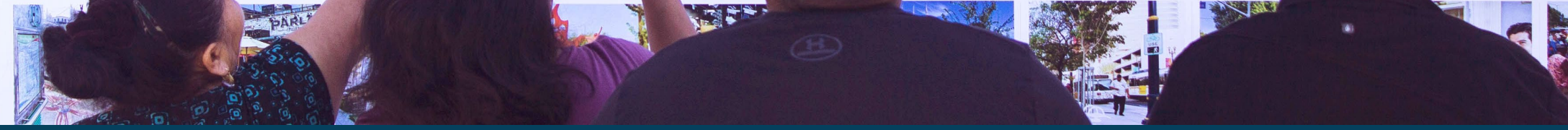
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## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What kind of improvements...  
¿Cuales mej...  
PICK YOUR TOP 3

What would you like to see n...  
¿Qué te gustaría ver más...  
PICK YOUR TOP 3 | ELIJA



LOW-INCOME  
RESIDENTS

# Housing Element

# What is a Housing Element

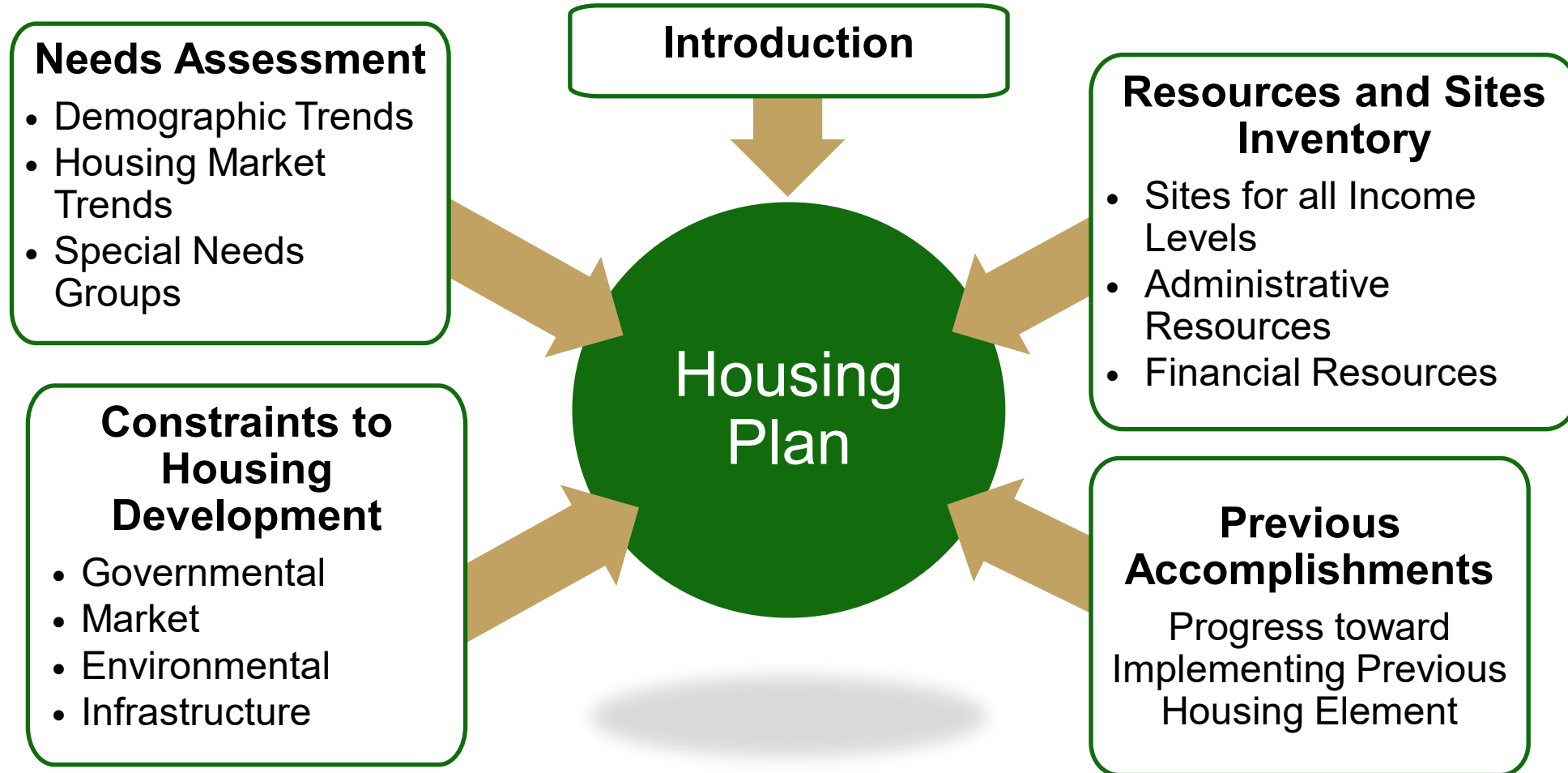
- A State-required element of the General Plan
- Only General Plan element that requires review and “certification” by a State agency, the Department of Housing & Community Development (HCD)
- 2021-2029 update due October 15, 2021



# Housing Element Legislative Intent

“The availability of housing is of **vital statewide importance**...[and] local and state governments have a responsibility to use the powers vested in them to **facilitate the improvement and development of housing** to make adequate provision for the housing needs of **all economic segments** of the community.”

# What is in a Housing Element?



# Poll Question #2

**Are your organization's participants mostly:**

- Homeowners
- Renters
- Not sure
- Other

# What is Affordable Housing?

- **Affordable housing:** A household pays no more than 30% of its annual income on housing
- **Cost burden:** When monthly housing costs (including utilities) exceed 30% of monthly income



**39%** of all Commerce households

*and*

**54%** of low-income households experience housing cost burden

# Income Limits for Los Angeles County

Income Level	1-Person	2-Person	3-Person	4-Person	5 Person
<b>Extremely Low (0-30% AMI)</b>	\$25,050	\$28,600	\$32,200	\$35,750	\$38,650
<b>Very Low (31-50% AMI)</b>	\$41,700	\$47,650	\$53,600	\$59,550	\$64,350
<b>Low (51-80% AMI)</b>	\$66,750	\$76,250	\$85,800	\$95,300	\$102,950
<b>Moderate (81-120% AMI)</b>	\$76,500	\$87,450	\$98,350	\$109,300	\$118,050
<b>Area Median Income (AMI)</b>	\$63,750	\$72,900	\$82,000	\$91,100	\$98,400

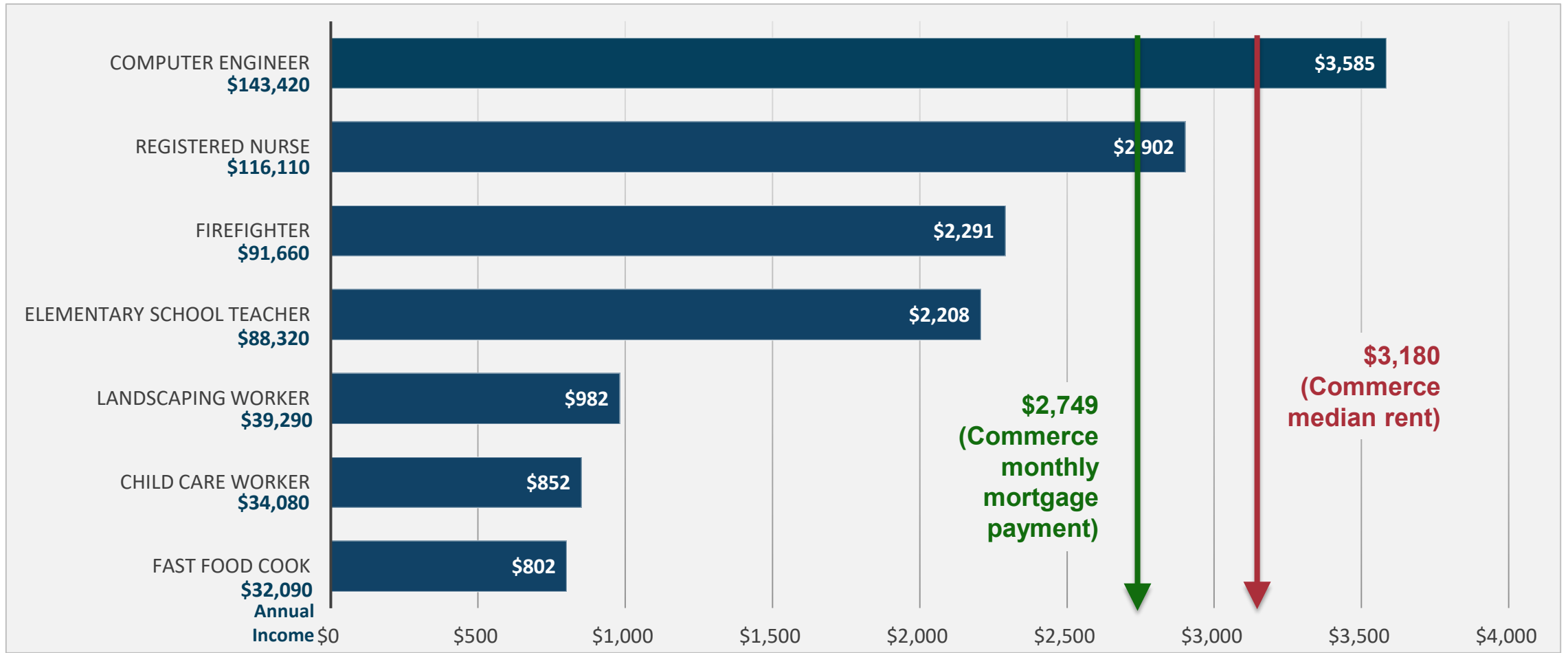
**Affordable housing = 30% of household income**

Example:  $\$90,100 \times 30\% = \$27,030/12 \text{ months} \rightarrow \$2,252 \text{ per month}$

AMI = Area Median Income

Los Angeles County AMI = \$91,100 (family of 4)

# Housing Cost v. Income



\*For a median priced home; Source: Zillow.com mortgage data; Zumper rent trend data November 2022

# What is the RHNA?

## Regional Housing Needs Assessment:

(Asignación Regional de Necesidades de Vivienda)



HCD determines  
RHNA for each  
Council of  
Governments



RHNA for  
SCAG region:  
1,341,827  
housing units



RHNA for  
Commerce:  
247 housing units

# Commerce RHNA by Income Group

Income Group	% of AMI	Annual Income Range*	Commerce 2021-2029 RHNA	% Of Units
Very Low	0-50%	\$0 - \$38,650	55	22%
Low	51-80%	\$38,651 - \$61,840	22	9%
Moderate	81-120%	\$61,841 - \$92,760	39	16%
Above Moderate	120% +	\$92,760 +	131	53%
Total			247	

\*A range of household incomes that represents a percentage of the area median family income (MFI). The 2022 MFI for a family of four in Los Angeles County is \$91,100. Source: SCAG, 2020; CA HCD 2020 Income Limits

Goals for accommodating new housing need through comprehensive land use policies and planning (zoning)

*(not a construction obligation)*



# Neighboring RHNA Allocations

Jurisdiction	Population	Housing Units	Units for 2021 – 2029 RHNA
<b>Commerce</b>	<b>12,868</b>	<b>3,468</b>	<b>247</b>
Bell Gardens	42,449	10,012	503
Montebello	63,544	20,051	5,186
Downey	113,529	35,838	6,525
Pico Rivera	63,374	17,173	1,024
South Gate	97,003	24,540	8,282
Los Angeles County	10,172,951	3,590,574	812,060

# Meeting the RHNA

**1** **Approved housing and mixed-use projects**

**2** **Projects in the development process**

**3** **Potential sites for new housing**

- Vacant sites
- Underutilized sites that could redevelop
- Accessory dwelling units

# How Do We Assign Affordability?

**Density = Affordability**



# What does density look like?



**30**  
**units per acre**



**42**  
**units per acre**



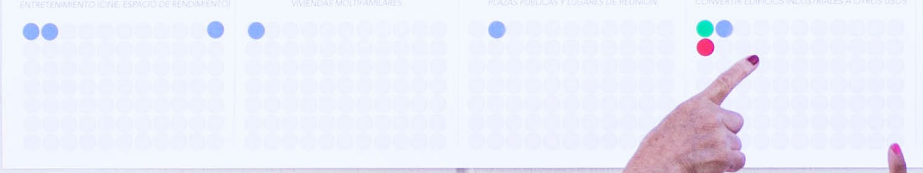
**60**  
**units per acre**

# Affirmatively Furthering Fair Housing (AFFH)

**Meaningful actions** to combat discrimination, overcome patterns of segregation and **foster inclusive communities** free from barriers that restrict access to opportunity.



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GENERAL  
SEPTEMBER

What kind of improvements would you like to see on Blvd?

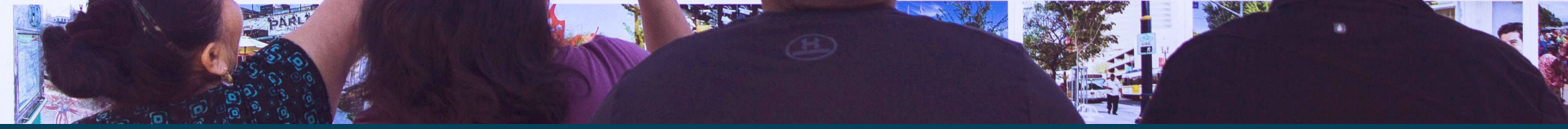
¿Cuales mejoras te gustaría ver en Blvd?

PICK YOUR TOP 3

What would you like to see more of?

¿Qué te gustaría ver más?

PICK YOUR TOP 3 | ELIGE TUS 3 MEJORES



LOW-INCOME  
RESIDENTS

# Special Housing Needs

# Special Needs Groups

- Housing element law requires an analysis of housing needs for residents in specific special needs groups
- These groups often spend a disproportionate amount of their income on safe and decent housing and are sometimes subject to discrimination



Persons with Disabilities



Large Households (5+ members)



Female Headed Households



Elderly (65+ Years)



Agricultural Workers

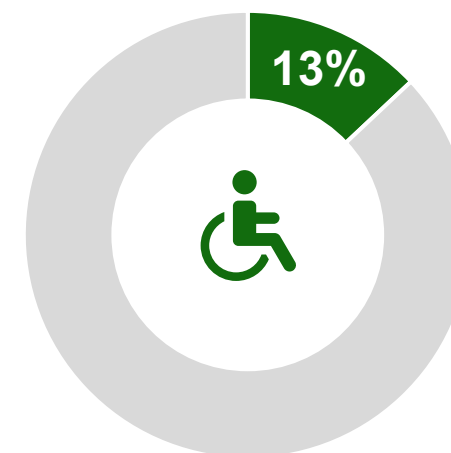


People Experiencing Homelessness

# Persons with Disabilities

- Disabled residents typically have limited incomes and often receive Social Security income only, which means their monthly income is often devoted to housing costs.
- They may face difficulty finding accessible housing (heights of installations and cabinets, wheelchair access, etc.) because of limited number of such units

Commerce residents  
with a disability



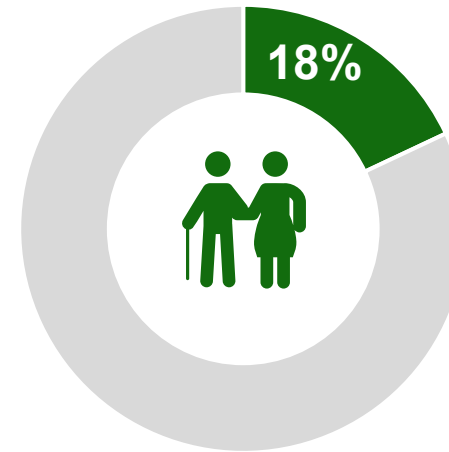
Disability Type	Percent
Hearing Difficulty	2.2%
Vision Difficulty	2.9%
Cognitive Difficulty	6.5%
Ambulatory Difficulty	7.2%
Self-Care Difficulty	4.0%
Independent Living Difficulty	6.9%
<b>Total with a Disability</b>	<b>13.4%</b>



# Elderly 65+

- Senior-headed households have special needs due to:
  - Low incomes
  - Disabilities
  - Dependency needs

Commerce Senior Population



**30% of seniors have a disability**

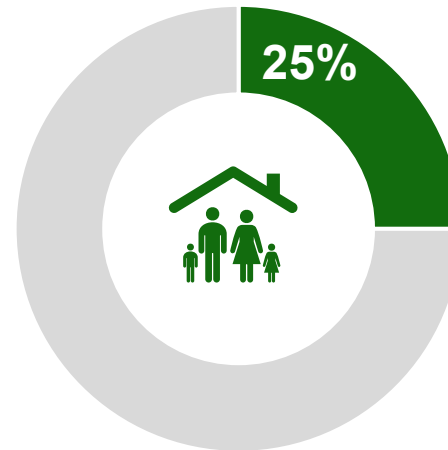


**14% of seniors live alone**

# Large Households (5+ members)

- Large households are defined by HCD as containing five or more persons
- These households require adequately sized and affordable housing units, which can be difficult to acquire
- A lack of this type of housing could lead to doubling-up with other families and overcrowding

Large Households in Commerce



Of these large households



**31% are renter households**

vs.



**69% are owner households**

# Agricultural Workers

- Agricultural workers have difficulty finding affordable and safe housing due to low wage and high housing costs



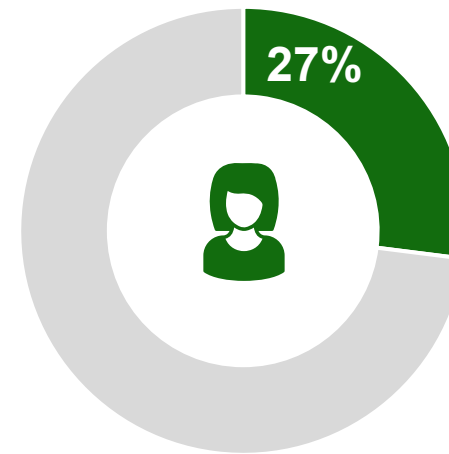
**0.5%** of Commerce residents are **agricultural workers\***

\*Agricultural workers includes agriculture, forestry, fishing, and hunting

# Female Headed and Single Parent Households

- Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, due to only one income

Commerce Female-Headed Households



**35%** of female-headed households live in poverty

and

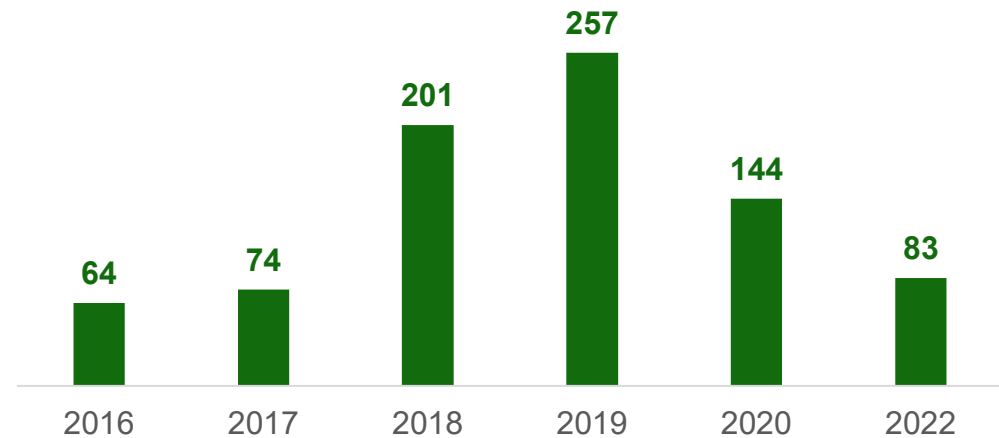
Over **60%** of all households living in poverty are female-headed households

# People Experiencing Homelessness

- Homelessness results from a combination of factors, such as loss of employment, inability to find a job due to lack of skills, and high housing costs in comparison to incomes
- Chronic health problems, physical and mental disabilities, and substance use could also lead to homelessness

**83** unsheltered individuals were counted in Commerce.

The number has decreased since 2019.



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**LOW-INCOME RESIDENTS**

## REIMAGINE COMMERCE

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What kind of improvements...  
¿Cuales mej...  
PICK YOUR TOP 3



## REIMAGINE COMMERCE

GENERAL SEPTEMBER

What would you like to see n...  
¿Qué te gustaría ver más...  
PICK YOUR TOP 3 | ELIJA

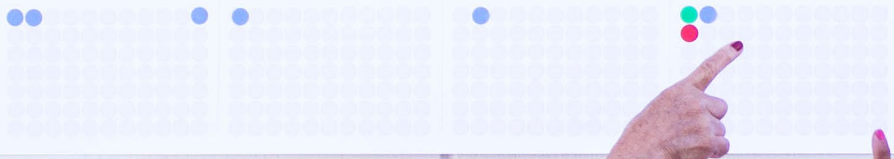


# Next Steps

# Schedule and Next Steps

- **November 17 – December 16:** Citywide online housing survey
- **December 1 or December 8:** Joint City Council/Planning Commission study session
- **February 13:** Joint City Council/Planning Commission study session
- **Spring 2023:** Preliminary draft housing element released for public comment

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## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

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PICK YOUR TOP 3 | ELIGE TUS 3 MEJORES

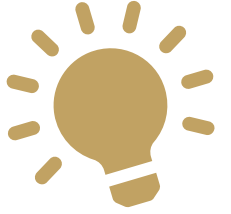


LOW-INCOME  
RESIDENTS

# Share Your Thoughts

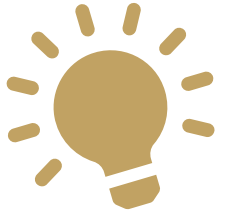


# Your Ideas



**What are the major special housing needs issues/challenges in Commerce?**

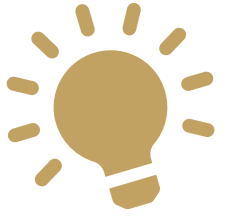
# Your Ideas



**What types of special needs housing are particularly needed in the community?**

**What kinds of supportive services should be included in the housing for your clients?**

# Your Ideas



**Where can new housing catering to your clients be accommodated in the City? Any locational considerations?**

**What are creative solutions to address special housing needs in Commerce?**





# Housing Element Workshop

## Taller de Elemento de Vivienda

February 28, 2023

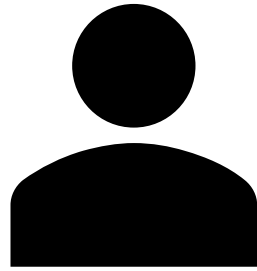




# Agenda / *Agenda*

- Welcome & Introductions
  - Setting the Stage
  - What We've Heard So Far
  - Commerce Today
  - A Housing Element is...
  - Your Thoughts
  - Next Steps
- *Bienvenida y presentaciones*
  - *Preparando el escenario*
  - *Lo que hemos escuchado hasta ahora*
  - *Commerce hoy*
  - *Un Elemento de Vivienda es...*
  - *Sus pensamientos*
  - *Próximos pasos*

# Workshop Facilitators / *Facilitadores del Taller*



[INSERT  
HEADSHOT]  
Viviana Esparza  
Interim Director  
Commerce



Ignacio Rincon  
Contract City Planner  
Commerce



Lisa Brownfield  
Principal  
MIG



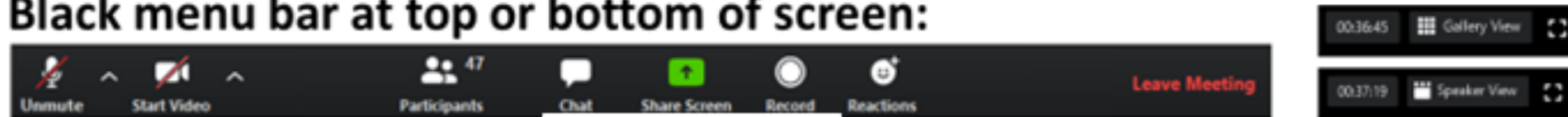
Veronica Tam  
Principal  
Veronica Tam & Associates



Alfonso Ramirez  
Project Associate  
MIG

# How to Use Video Conferencing

## Black menu bar at top or bottom of screen:



### Audio

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### Video

### Participants

- See Others
- Rename Yourself (Name & Group/Agency Affiliation if applicable)
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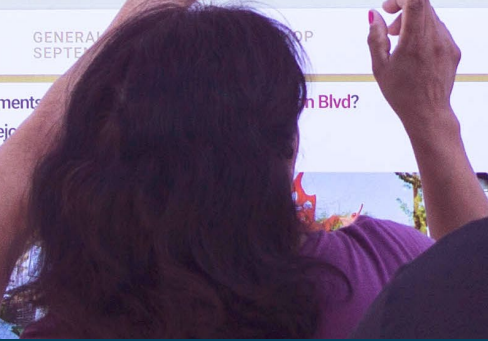
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What kind of improvements...

¿Cuales mej...

PICK YOUR



## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What would you like to see...

¿Qué te gustaría ver más...

PICK YOUR TOP 3 | ELIJA...



LOW-INCOME  
RESIDENTS

# Setting the Stage

## *Preparando el escenario*



The General Plan is a visionary document that identifies if and how a city will grow and change

The Housing Element is:

- One of 7 required General Plan elements
- Required to be updated every 8 years
- Reviewed and “Certified” by Department of Housing & Community Development (HCD)
- Pertinent for the 2021 to 2029 (6<sup>th</sup> Cycle) period

El Plan General: Un documento para planear el crecimiento y desarrollo urbano

El Elemento de Vivienda es:

- Uno de 7 capítulos que abarca el plan general conocido como *elementos*
- *Actualizado cada ocho años*
- Revisión requerido por el estado, el Departamento de Vivienda y Desarrollo Comunitario
- Con respecto al período 2021 a 2029 (6<sup>to</sup> ciclo).

# Why this planning process matters/

## *Por qué es importante este proceso de planificación*



Addresses the City's strategic priorities related to housing, transportation, children and youth  
*Aborda las prioridades estratégicas de la ciudad relacionadas con vivienda, transporte, niños y jóvenes*



Helps us respond to the needs of our most vulnerable community members  
*Nos ayuda a responder a las necesidades de los miembros más vulnerables de nuestra comunidad*

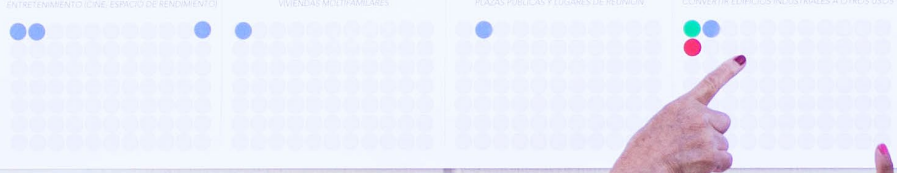


Supports the City's economic development and ability to attract and retain a local workforce  
*Apoya el desarrollo económico de la Ciudad y la capacidad de atraer y retener una fuerza laboral local*



Demonstrates our community values of our residents  
*Demuestra los valores comunitarios de los residentes*

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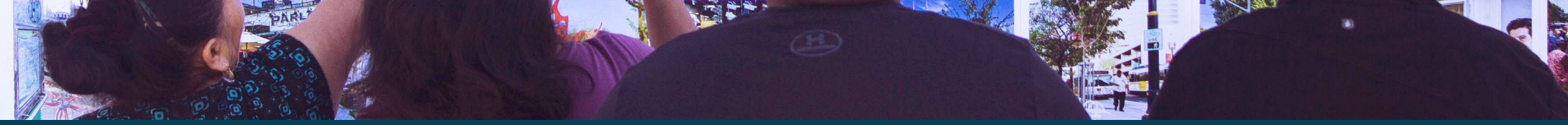
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LOW-INCOME  
RESIDENTS

# What We Have Heard So Far

## *Lo que hemos escuchado hasta ahora*

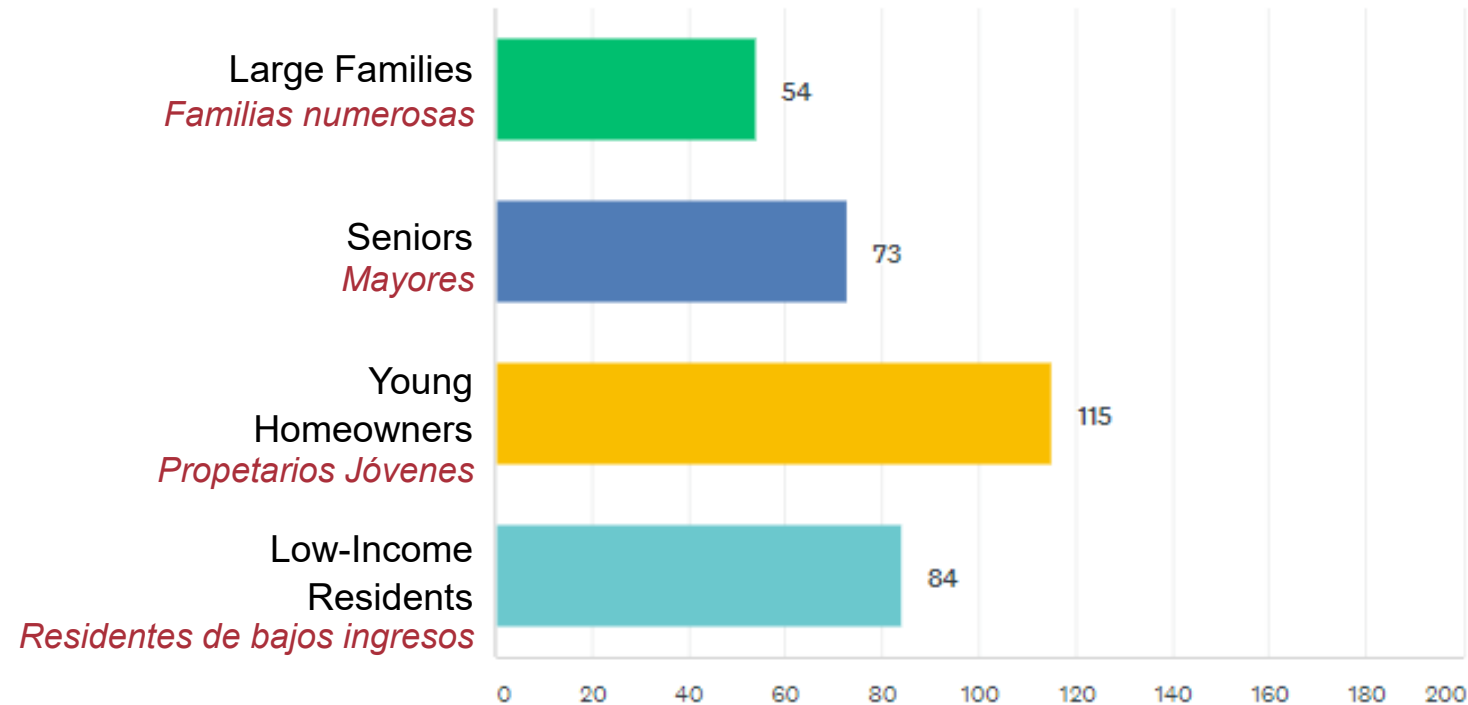
# Focus Group / Grupo Focal



# Commerce should provide housing for...

## *Commerce debe proporcionar Viviendas para...*

170 Respondents / Encuestados

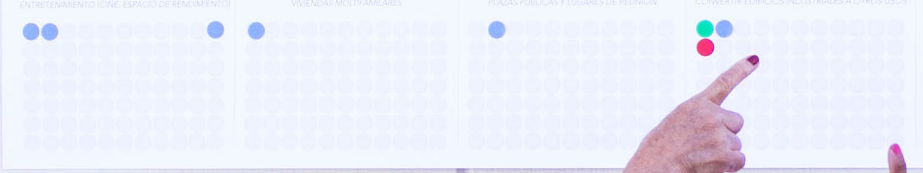


- What are the major housing issues in Commerce?
- What are the challenges to providing housing in Commerce?
- Where can new housing be accommodated?
- What are creative solutions to provide more housing?

- *¿Cuáles son los problemas principales de vivienda en Commerce?*
- *¿Cuáles son los desafíos para proporcionar vivienda en Commerce?*
- *¿Dónde se pueden acomodar las nuevas viviendas?*
- *¿Cuáles son las soluciones creativas para proporcionar más viviendas?*



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GENERAL  
SEPTEMBER

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PICK YOUR TOP 3

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¿Qué te gustaría ver más?

PICK YOUR TOP 3 | ELIGE TUS 3 MEJORES



LOW-INCOME  
RESIDENTS

# Commerce Today *Commerce Hoy*

	2010	2020	Change/ <b>Diferencia</b>
Population/ <i>Poblacion</i>	12,823	12,888	+0.5%
% Seniors/ <i>Mayores</i>	9.2%	17.9%	+94.6%
Median Age/ <i>Edad Media</i>	28.1	37.5	+33.5%
% Hispanic/ <i>Hispano</i>	91.3%	95.2%	+4.3%
% Homeowners/ <i>Propetarios de viviendas</i>	51.3%	55.2%	+7.6%
% Renters/ <i>Inquilinos</i>	48.7%	44.8%	-8.2%
% Families/ <i>Familias</i>	82.8%	76.5%	-7.6%
Housing Units/ <i>Unidades de Viviendas</i>	3,470	3,524	+1.5%
% Single-Family Homes/ <i>Casas Unifamilares</i>	78.0%	77.9%	-0.1%



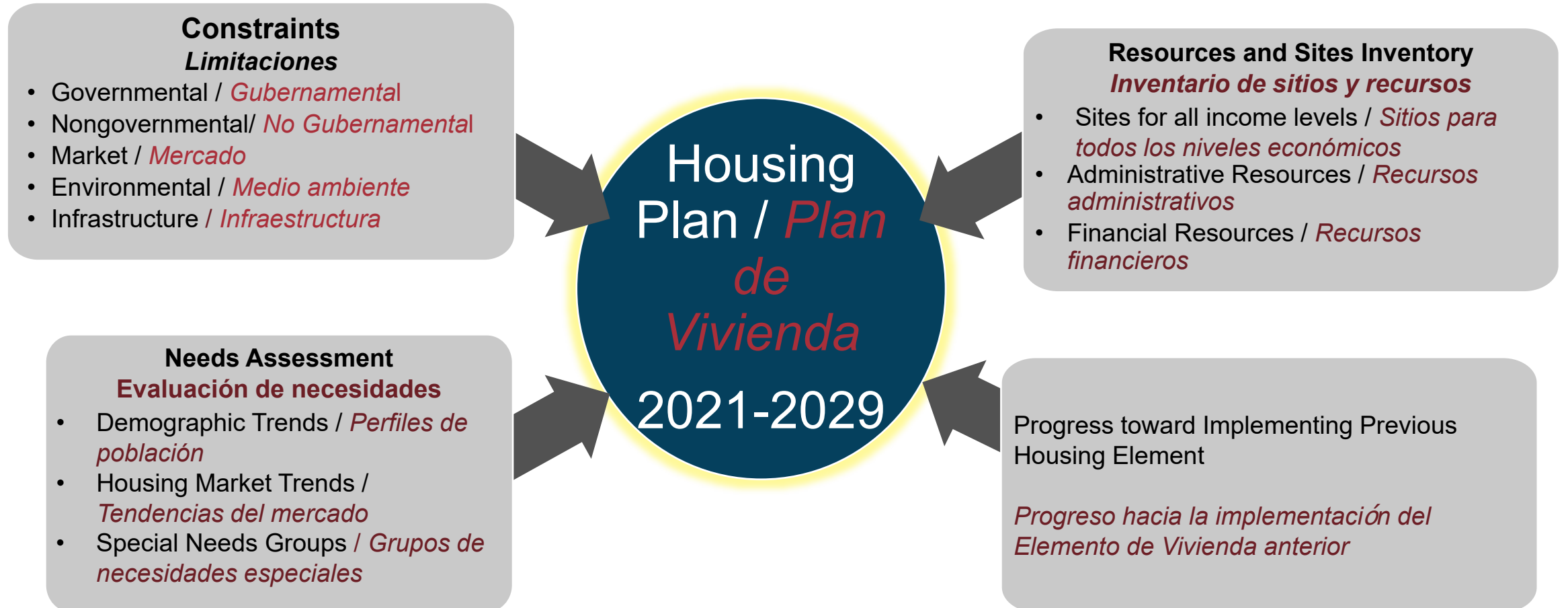
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A Housing Element is ...  
*Un Elemento de Vivienda es ...*

# Housing Element Content

## *Contenido del Elemento de Vivienda*



# Housing Element Role / *Papel de Elemento de Vivienda*

The housing element DOES...

*El elemento de la vivienda SI...*

- Assess and address constraints to development
- *Evalúa y abordar las limitaciones al desarrollo*
- Guide housing development policy
- *Orienta la política de desarrollo de la vivienda*
- Identify opportunities to meet the City's housing needs
- *Identifica oportunidades para satisfacer las necesidades de vivienda de la Ciudad*

# Housing Element Role / *Papel de Elemento de Vivienda*

**The housing element DOES NOT...**

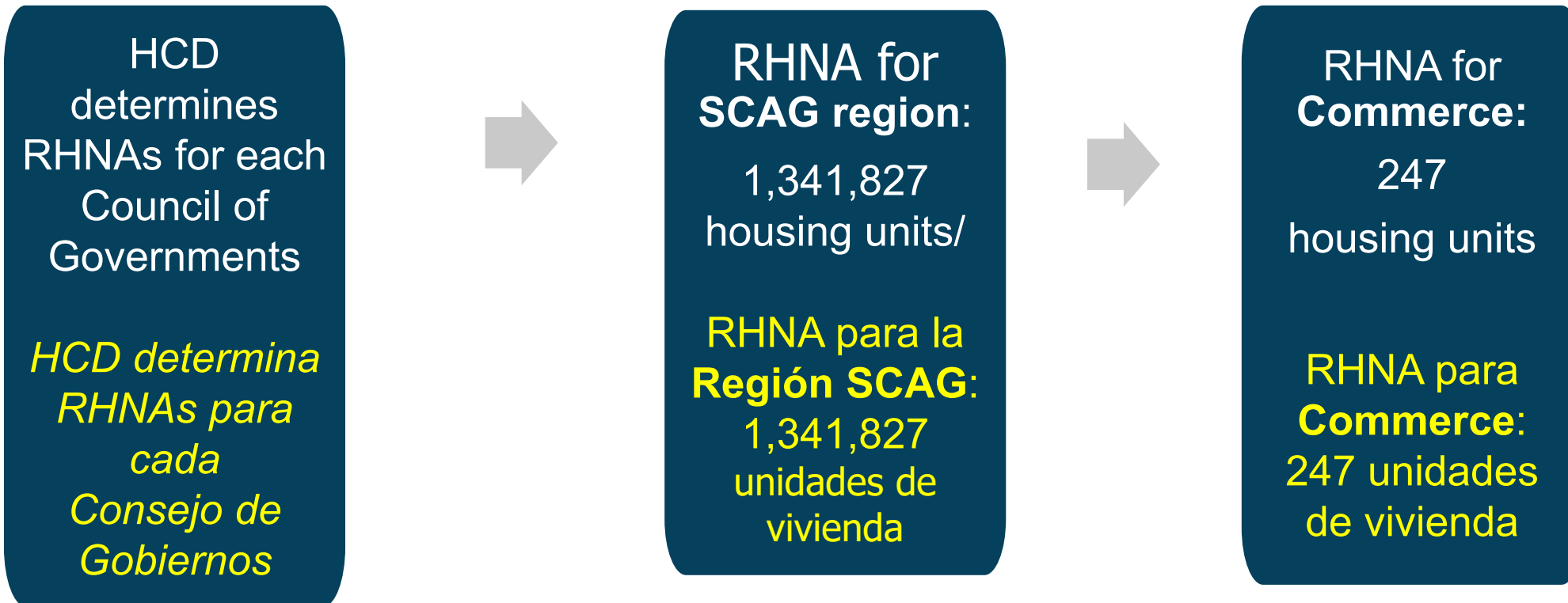
*El elemento de vivienda NO...*

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- Solve all housing problems
- *Soluciona todos los problemas de vivienda*

# What is the RHNA / ¿Qué es la RHNA?

Regional Housing Needs Allocation:

*Asignación de las necesidades regionales de vivienda:*



# Regional Housing Needs Allocation

## *Asignación de las Necesidades Regionales de Vivienda*

Income Category / <i>Nivel Económico</i> (% of AMI)	RHNA	% of Housing <i>% de Viviendas</i>
Extremely Low / <i>Extremadamente Bajo</i> (<50% AMI)	28	11.3%
Very Low / <i>Muy Bajo</i> (31-50% AMI)	27	10.9%
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Moderate / <i>Moderado</i> (81 to 120%)	39	15.8%
Above Moderate / <i>Más que Moderado</i> (Over 120%)	131	53.0%
Total	247	100.0%

# State Income Threshold / *Ingresos Estatales*

Affordable housing +30% of household income/ *Vivienda asequible + 30% del salario de la familia*

Income Level/ <b>Nivel Economico</b>	1-Person/ <b>Persona</b>	2-Persons/ <b>Personas</b>	3-Persons/ <b>Personas</b>	4-Persons/ <b>Personas</b>	5-Persons/ <b>Personas</b>
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AMI = Area Median Income/*Nivel promedio del área*

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## ¿Qué es la Vivienda Asequible?

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# MEETING THE RHNA / *CUMPLIR EL RHNA*

## Projected ADUs

2 units/year; 16 units over 8

Approved projects (constructed/completed after July 1, 2021)

Rosewood Village Project (3 sites; 133 total units; 9 workforce units)

## Potential sites

- Vacant sites
- Underutilized sites that could redevelop
- Higher-density sites for lower-income RHNA

ADU: Accessory Dwelling Unit  
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*Proyectos aprobados (construidos/completado después del 1 de julio de 2021)*

*Proyecto Rosewood Village (3 sitios; 133 unidades en total; 6 unidades workforce)*

## *Sitios potenciales*

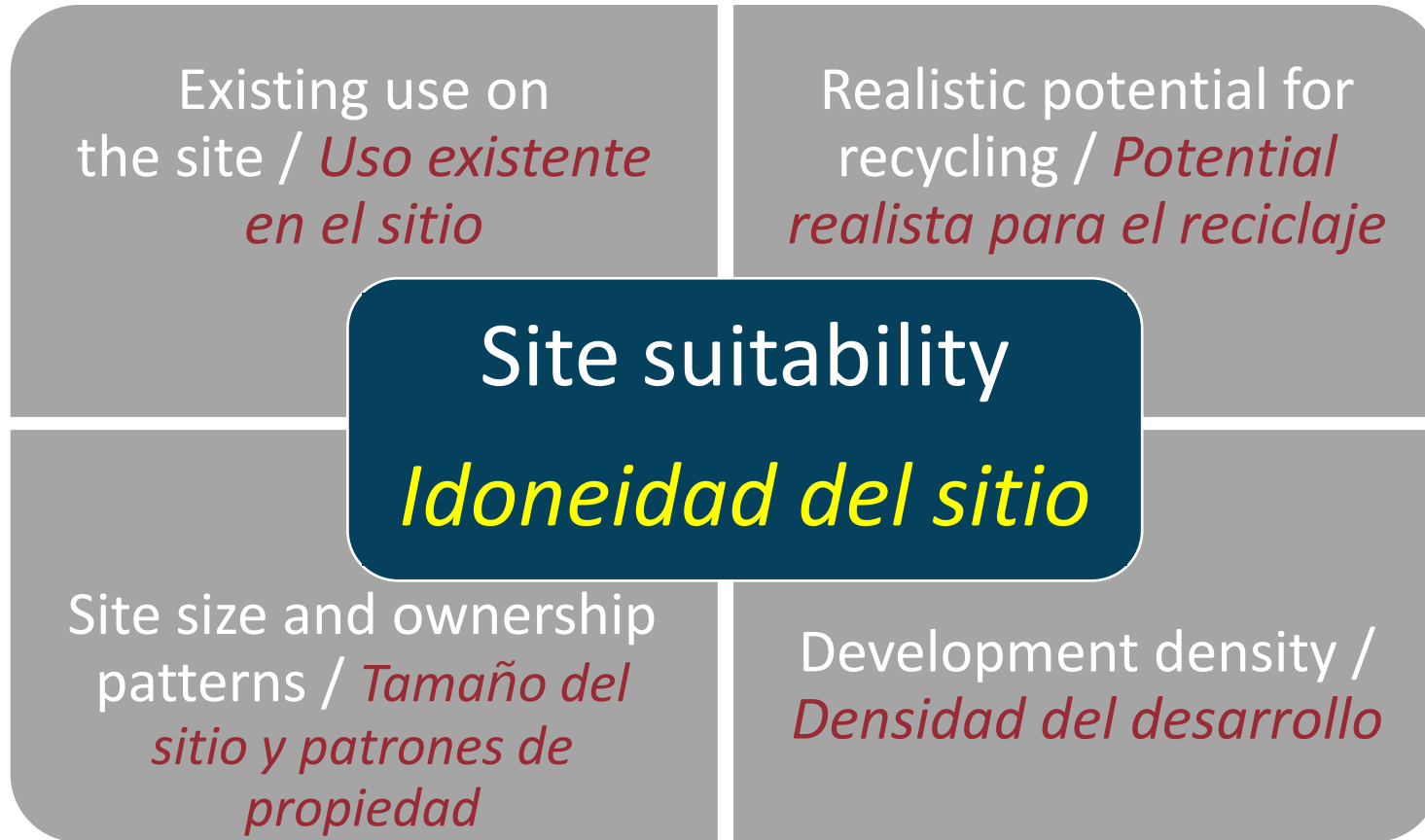
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*Metas para satisfacerla demanda de vivienda mediante políticas comprensivas de uso de suelo y zonificación – no son obligaciones constructivas*

# Site Suitability Criteria / *Criterios de sitios apropiados*



# Additional Sites / *Sitios Adicionales*

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s eventos y para dar su opinión!



OTHER (PLACE NOTE BELOW  
OTRO (COLOCAR NOTA ABAJO)

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What kind of improvements would you like to see on Blvd?

¿Cuales mejoras te gustaría ver en Blvd?

PICK YOUR TOP 3

What would you like to see more of?

¿Qué te gustaría ver más?

PICK YOUR TOP 3 | ELIGE TUS 3 MEJORES



LOW-INCOME  
RESIDENTS

# Your Thoughts *Sus Pensamientos*

- What are the major housing issues in Commerce?
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\*6



Mute/Unmute  
*Silenciar/Desactivar*

\*9



Raise Hand  
*Mano arriba*



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OTHER (PLACE NOTE BELOW  
OTRO (COLOCAR NOTA ABAJO)

COMMERCIAL DISTRICT  
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LOW-INCOME RESIDENTS

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GENERAL SEPTEMBER

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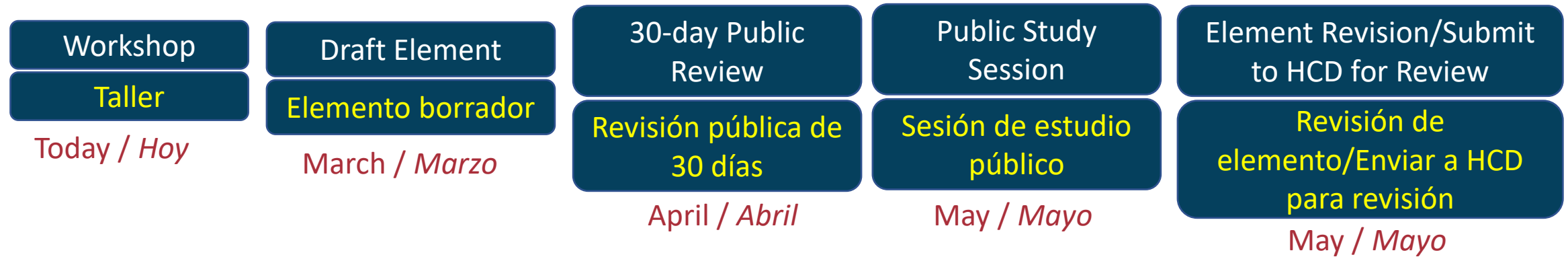
PICK YOUR TOP 3 | ELIGE TUS TOP 3

# Next Steps

## *Próximos Pasos*

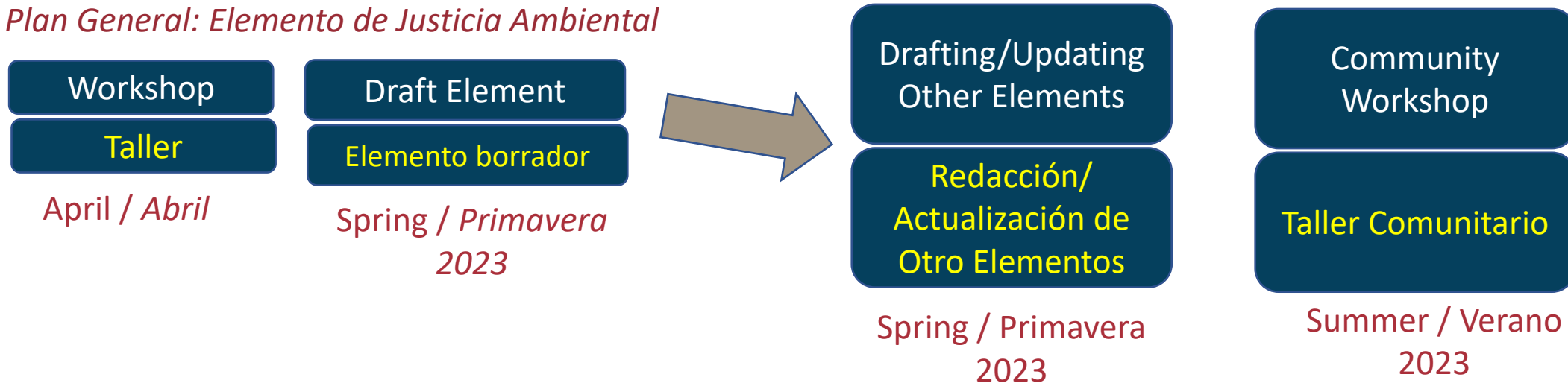
# Timeline / Linea de tiempo

## Housing Element/ *Elemento de Vivienda*



## General Plan : Environmental Justice Element

### *Plan General: Elemento de Justicia Ambiental*







# Housing Element Workshop

## Taller de Elemento Vivienda

February 28, 2023





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LOW-INCOME  
RESIDENTS

BIGGER HEARAY





# Housing Element Workshop

## Taller de Elemento de Vivienda

February 28, 2023

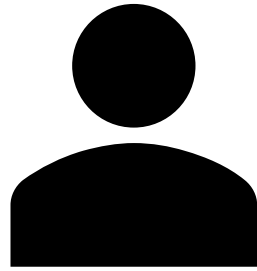




# Agenda / *Agenda*

- Welcome & Introductions
  - Setting the Stage
  - What We've Heard So Far
  - Commerce Today
  - A Housing Element is...
  - Your Thoughts
  - Next Steps
- *Bienvenida y presentaciones*
  - *Preparando el escenario*
  - *Lo que hemos escuchado hasta ahora*
  - *Commerce hoy*
  - *Un Elemento de Vivienda es...*
  - *Sus pensamientos*
  - *Próximos pasos*

# Workshop Facilitators / *Facilitadores del Taller*



[INSERT  
HEADSHOT]  
Viviana Esparza  
Interim Director  
Commerce



Ignacio Rincon  
Contract City Planner  
Commerce



Lisa Brownfield  
Principal  
MIG



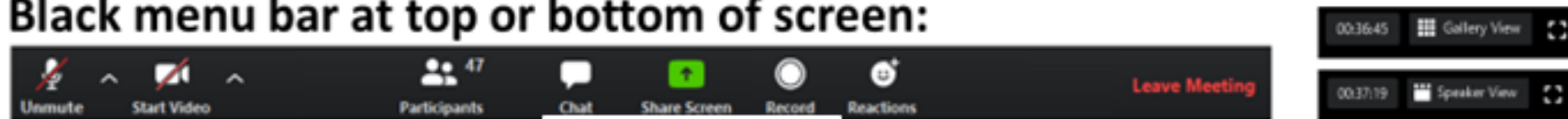
Veronica Tam  
Principal  
Veronica Tam & Associates



Alfonso Ramirez  
Project Associate  
MIG

# How to Use Video Conferencing

## Black menu bar at top or bottom of screen:



### Audio

Please mute yourself when not speaking

### Video

### Participants

- See Others
- Rename Yourself (Name & Group/Agency Affiliation if applicable)
- Raise Hand (remember to lower after)

### View

Gallery/Speaker View of videos and screen share can be changed in top right corner

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## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What kind of improvements...

¿Cuales mej...

PICK YO...



## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What would you like to see n...

¿Qué te gustaría ver más...

PICK YOUR TOP 3 | ELI...



LOW-INCOME  
RESIDENTS

# Setting the Stage

## *Preparando el escenario*

The General Plan is a visionary document that identifies if and how a city will grow and change

The Housing Element is:

- One of 7 required General Plan elements
- Required to be updated every 8 years
- Reviewed and “Certified” by Department of Housing & Community Development (HCD)
- Pertinent for the 2021 to 2029 (6<sup>th</sup> Cycle) period

El Plan General: Un documento para planear el crecimiento y desarrollo urbano

El Elemento de Vivienda es:

- Uno de 7 capítulos que abarca el plan general conocido como *elementos*
- *Actualizado cada ocho años*
- Revisión requerido por el estado, el Departamento de Vivienda y Desarrollo Comunitario
- Con respecto al período 2021 a 2029 (6<sup>to</sup> ciclo).



# Why this planning process matters/

## *Por qué es importante este proceso de planificación*



Addresses the City's strategic priorities related to housing, transportation, children and youth  
*Aborda las prioridades estratégicas de la ciudad relacionadas con vivienda, transporte, niños y jóvenes*



Helps us respond to the needs of our most vulnerable community members  
*Nos ayuda a responder a las necesidades de los miembros más vulnerables de nuestra comunidad*

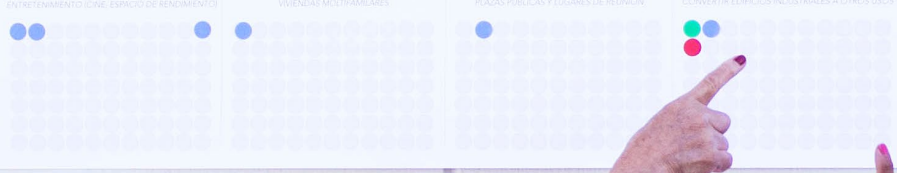


Supports the City's economic development and ability to attract and retain a local workforce  
*Apoya el desarrollo económico de la Ciudad y la capacidad de atraer y retener una fuerza laboral local*



Demonstrates our community values of our residents  
*Demuestra los valores comunitarios de los residentes*

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OTHER (PLACE NOTE BELOW  
OTRO (COLOCAR NOTA ABAJO)

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GENERAL  
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LOW-INCOME  
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# What We Have Heard So Far

## *Lo que hemos escuchado hasta ahora*

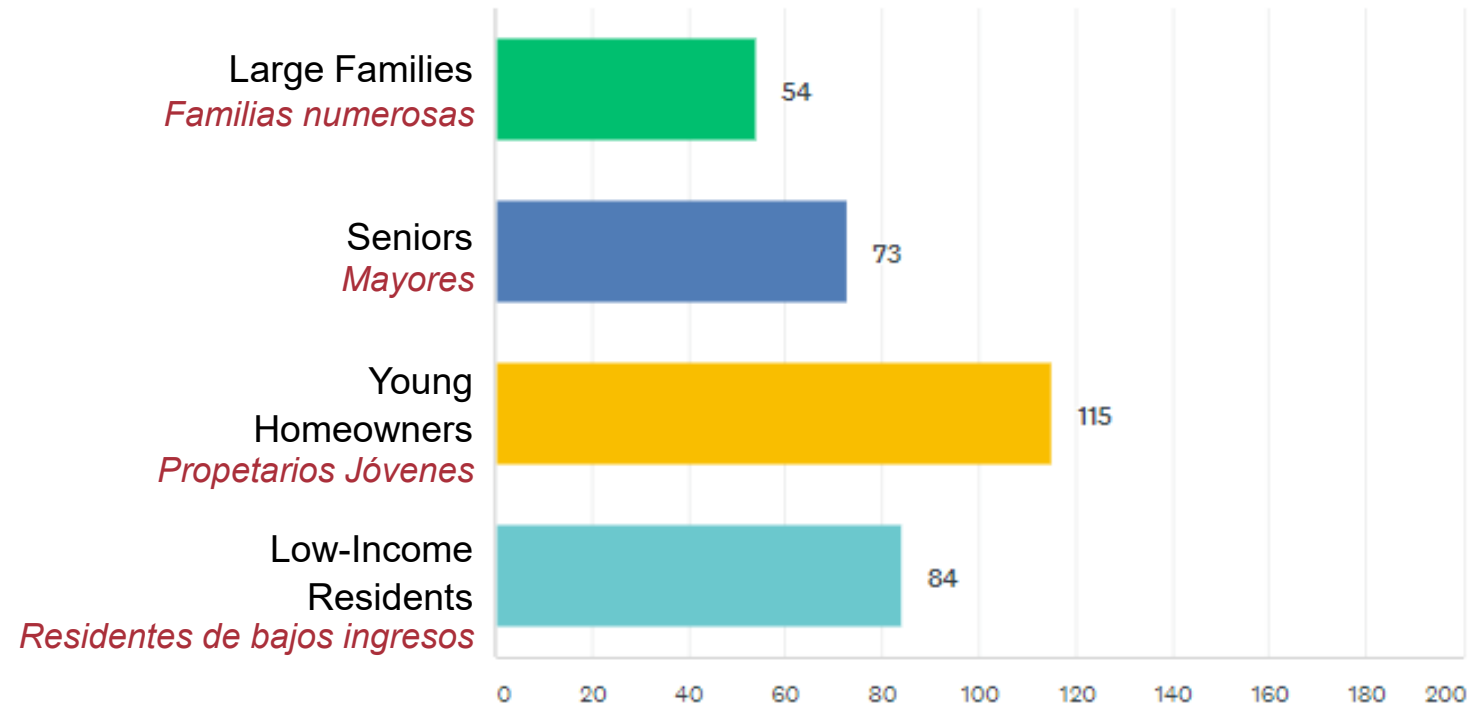
# Focus Group / Grupo Focal



# Commerce should provide housing for...

## *Commerce debe proporcionar Viviendas para...*

170 Respondents / Encuestados



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LOW-INCOME RESIDENTS

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GENERAL SEPTEMBER

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# Commerce Today

## *Commerce Hoy*

	2010	2020	Change/Diferencia
Population/ <i>Poblacion</i>	12,823	12,888	+0.5%
% Seniors/ <i>Mayores</i>	9.2%	17.9%	+94.6%
Median Age/ <i>Edad Media</i>	28.1	37.5	+33.5%
% Hispanic/ <i>Hispano</i>	91.3%	95.2%	+4.3%
% Homeowners/ <i>Propetarios de viviendas</i>	51.3%	55.2%	+7.6%
% Renters/ <i>Inquilinos</i>	48.7%	44.8%	-8.2%
% Families/ <i>Familias</i>	82.8%	76.5%	-7.6%
Housing Units/ <i>Unidades de Viviendas</i>	3,470	3,524	+1.5%
% Single-Family Homes/ <i>Casas Unifamilares</i>	78.0%	77.9%	-0.1%



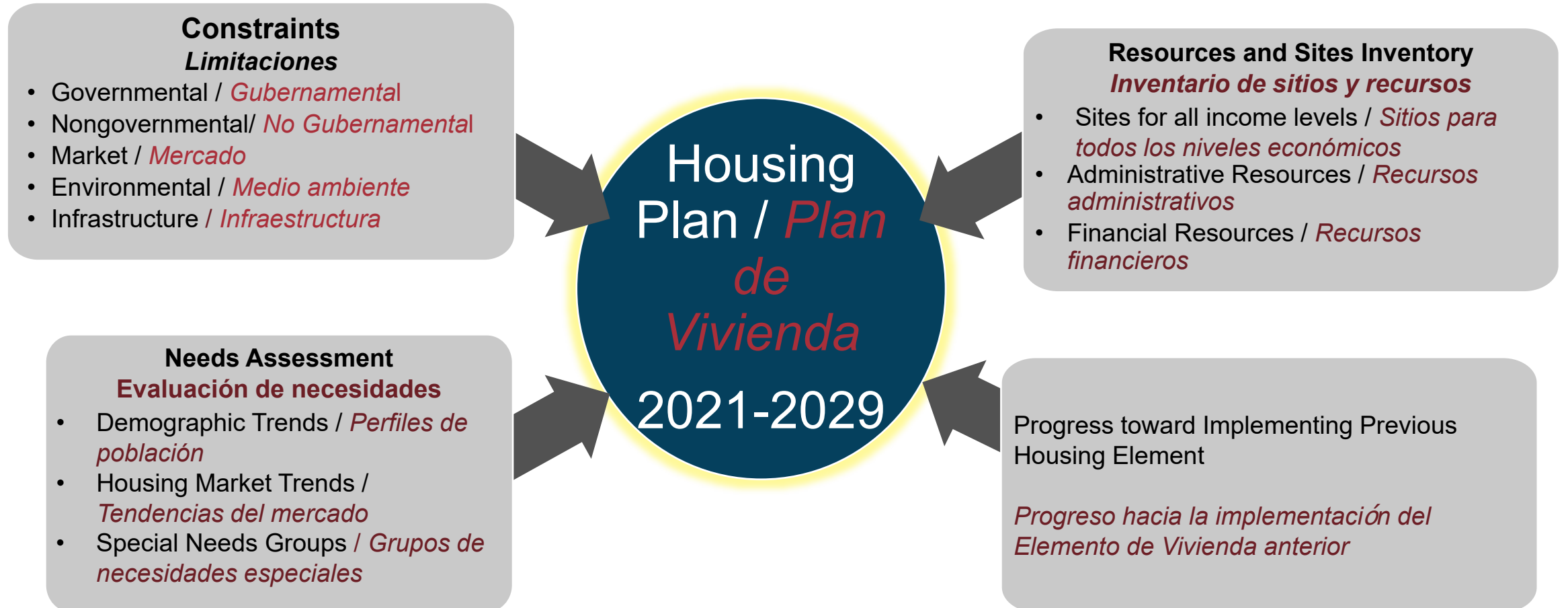
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A Housing Element is ...  
*Un Elemento de Vivienda es ...*

# Housing Element Content

## *Contenido del Elemento de Vivienda*



# Housing Element Role / *Papel de Elemento de Vivienda*

The housing element DOES...

*El elemento de la vivienda SI...*

- Assess and address constraints to development
- *Evalúa y abordar las limitaciones al desarrollo*
- Guide housing development policy
- *Orienta la política de desarrollo de la vivienda*
- Identify opportunities to meet the City's housing needs
- *Identifica oportunidades para satisfacer las necesidades de vivienda de la Ciudad*

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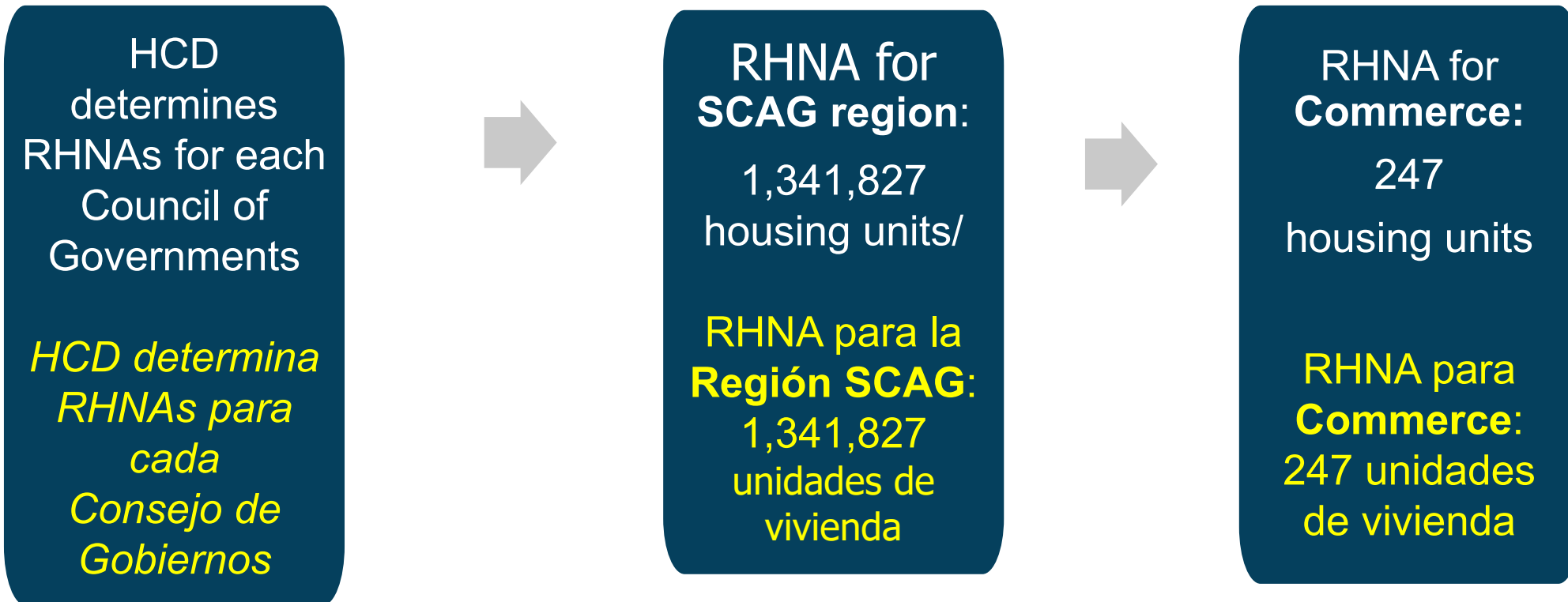
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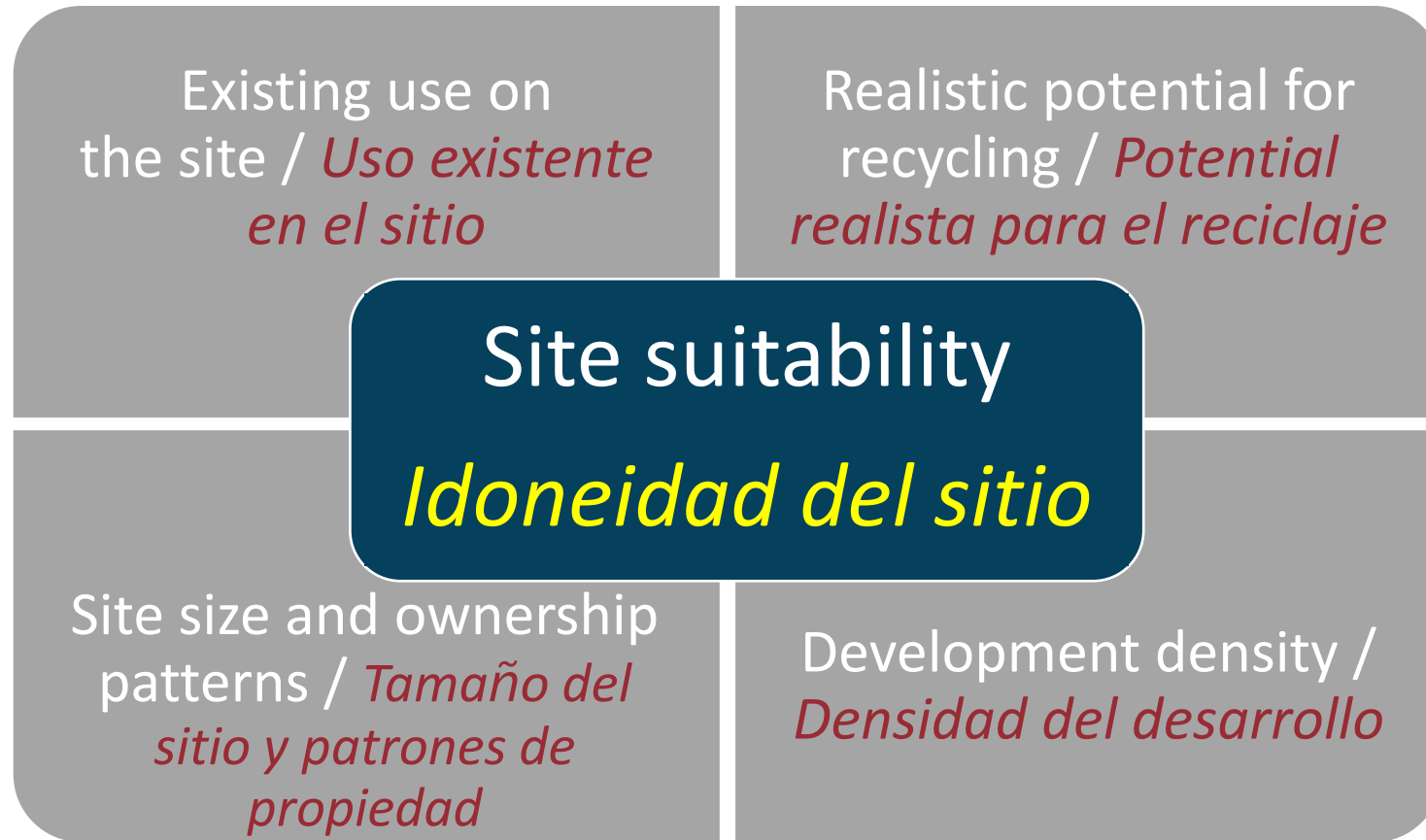
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OTHER (PLACE NOTE BELOW  
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COMMERCIAL DISTRICT  
COMMERCIAL DISTRICT  
COMMERCIAL DISTRICT

LOW-INCOME RESIDENTS

### REIMAGINE COMMERCE

GENERAL SEPTEMBER

What kind of improvements...  
¿Cuales mej...  
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### REIMAGINE COMMERCE

GENERAL SEPTEMBER

What would you like to see n...  
¿Qué te gustaría ver más...  
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# Your Thoughts

## *Sus Pensamientos*

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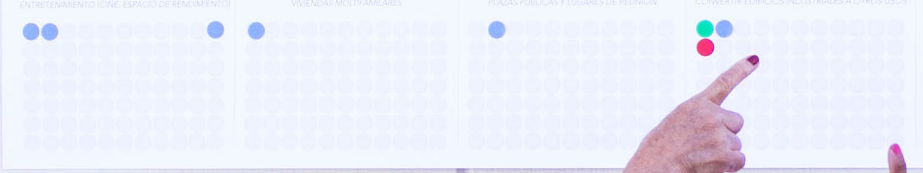
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OTRO (COLOCAR NOTA ABAJO)

## REIMAGINE COMMERCE

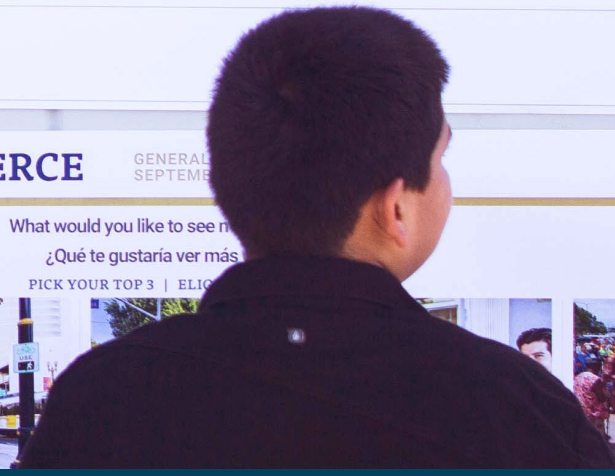
GENERAL  
SEPTEMBER

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What kind of improvements would you like to see on Blvd?  
¿Cuales mejoras te gustaría ver en Blvd?  
PICK YOUR TOP 3

What would you like to see more of?  
¿Qué te gustaría ver más?  
PICK YOUR TOP 3 | ELIGE



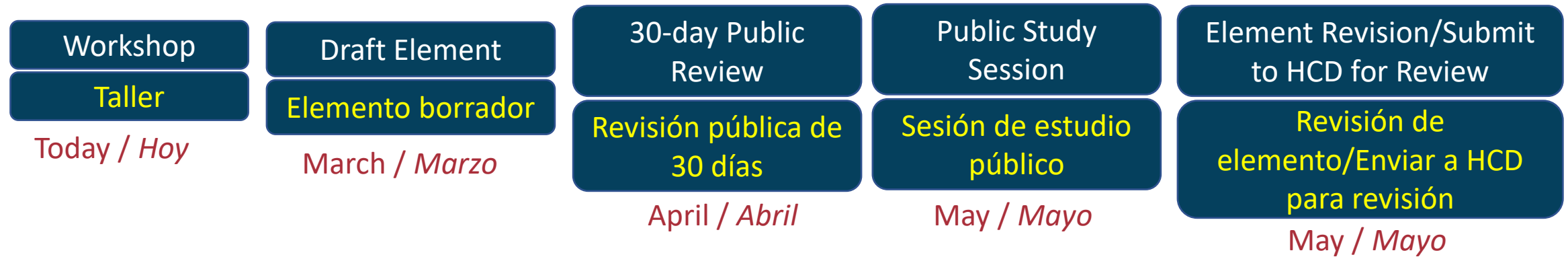
LOW-INCOME  
RESIDENTS

# Next Steps

## *Próximos Pasos*

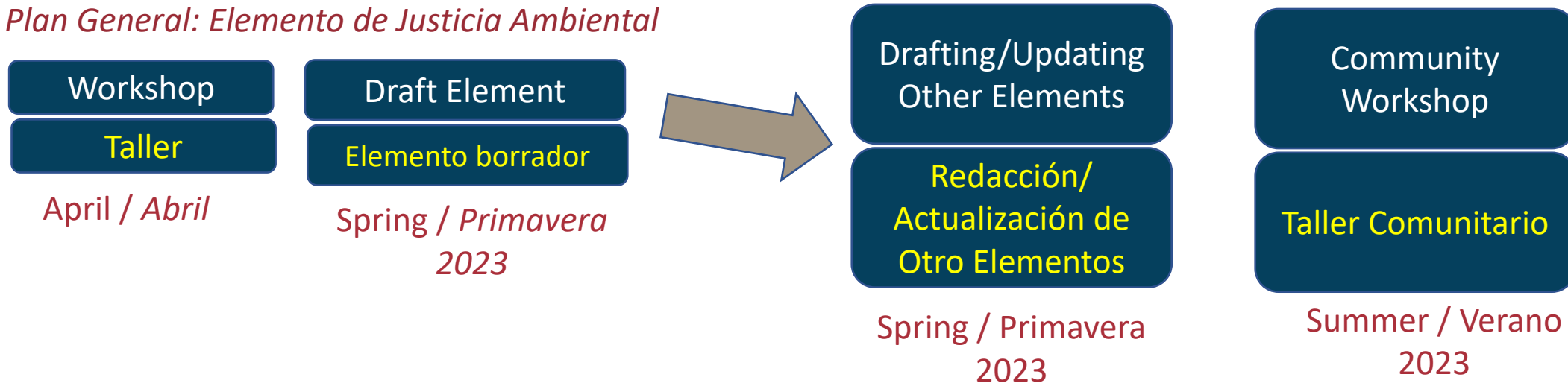
# Timeline / Linea de tiempo

## Housing Element/ *Elemento de Vivienda*



## General Plan : Environmental Justice Element

### *Plan General: Elemento de Justicia Ambiental*







# Housing Element Workshop Taller de Elemento Vivienda

February 28, 2023





sitio web para obtener  
sobre los próximos talleres,  
s eventos y para dar su opinión!



OTHER (PLACE NOTE BELOW  
OTRO (COLOCAR NOTA ABAJO)

BIGGER HEARAY

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What kind of improvements would you like to see on Blvd?

¿Cuales mejoras

PICK YOUR



LOW-INCOME  
RESIDENTS

## REIMAGINE COMMERCE

GENERAL  
SEPTEMBER

What would you like to see more of?

¿Qué te gustaría ver más

PICK YOUR TOP 3 | ELIGE





# City of Commerce Housing Element Update Survey

The City of Commerce needs your input! As we continue to grow, we must plan for current and future needs of residents by updating our housing policies and designating spaces to accommodate the City's share of regional housing for the 2021-2029 planning period. The Housing Element update helps us develop a variety of goals and policies to support the needs of our growing population, and for this we need to hear from you!

**WITH YOUR HELP WE CAN BETTER IDENTIFY  
CURRENT HOUSING CONDITIONS, NEEDS,  
AND PRIORITIES!**

## TAKE OUR SURVEY

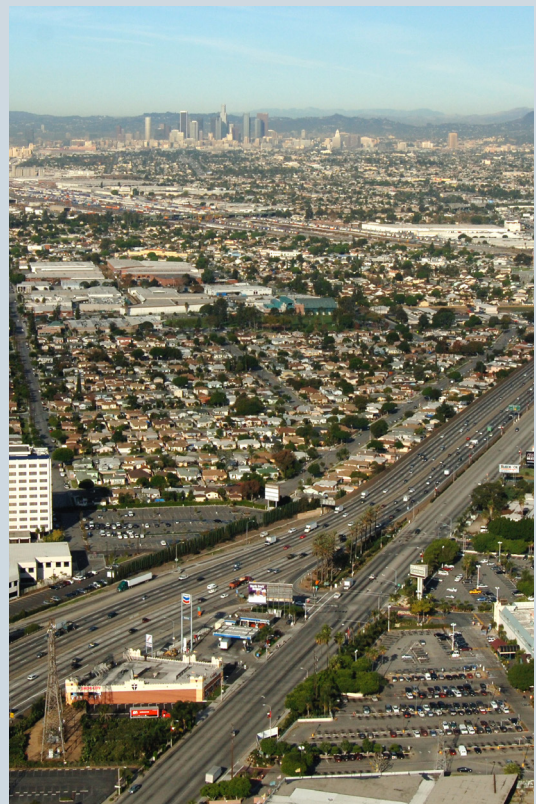
Scan the QR code below:



Or visit:

<https://migsurvey.limequery.com/245166?lang=en>

**Available from November 17, 2022 to  
December 15, 2022**





# Ciudad de Commerce

## Actualización del elemento de vivienda

### Encuesta

¡La Ciudad de Commerce necesita su opinión! A medida que continuamos creciendo, debemos planificar las necesidades actuales y futuras de los residentes actualizando nuestras políticas de vivienda y designando espacios para acomodar la parte de viviendas regionales de la Ciudad para el período de planificación 2021-2029. La actualización del Elemento de Vivienda nos ayuda a desarrollar una variedad de objetivos y políticas para apoyar las necesidades de nuestra creciente población, ¡y para esto necesitamos escuchar de usted!

**¡CON SU AYUDA PODEMOS IDENTIFICAR  
MEJOR LAS CONDICIONES, NECESIDADES Y  
PRIORIDADES ACTUALES DE VIVIENDA!**

**TOMA NUESTRA ENCUESTA**

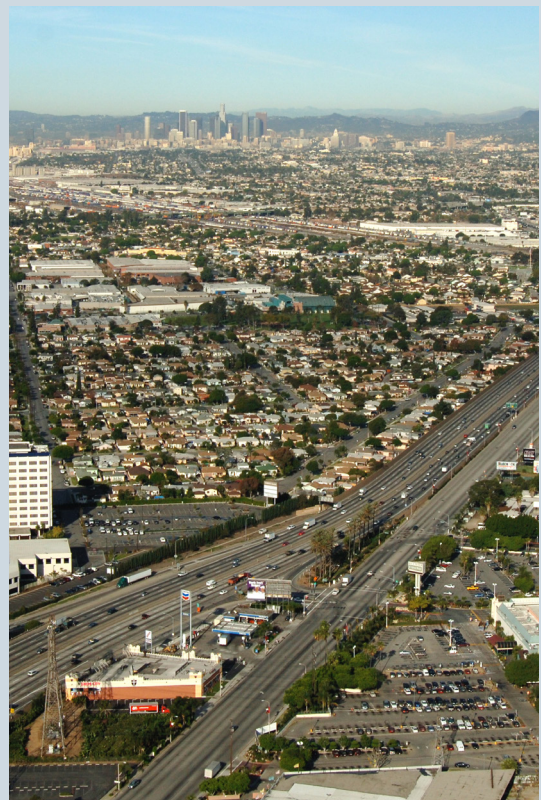
Escanea el código QR a continuación:



o visita:

<https://migsurvey.limequery.com/245166?lang=es>

**Disponible del 17 de noviembre de 2022 al  
15 de diciembre de 2022**





# Housing Element Update Survey Results Summary

Prepared by:



537 S. Raymond Avenue  
Pasadena CA 91105

March 13, 2023



## **Introduction:**

California cities are required to adopt a General Plan. A General Plan establishes the framework for decision making in the community. As required by State law, the City of Commerce is updating one of its General Plan's elements – Housing. The Housing Element identifies how Commerce can meet existing and future housing needs for all income levels of its population. Community input is critical to ensure community needs, values, and preferences are reflected. Woven throughout the Element's update is a comprehensive community engagement plan that will be used to inform the plan update process.

This Housing Element community survey solicited public input regarding the current state of housing, as well as any housing-related issues facing Commerce and its residents. The survey responses and results are summarized below.

The City's website contains more information about the General Plan update and upcoming activities. <https://www.reimaginecommerce.com/>

## **Methodology:**

The City is conducting a variety of outreach activities to solicit community input. The Housing Element survey being one of the outreach methods. The survey was made available from November 17, 2022 to December 15, 2022. The survey was promoted extensively through the City's online and "live" communication channels, including email communications to stakeholders, social media posts, and the City's website.

In total, the City received 11 responses to the survey questions. Of these responses, 3 surveys received complete responses (answers provided for every survey question), the remaining 8 received partial responses (some questions did not receive answers); these partial responses were included in the summary analysis.

### **Key Findings:**

Of the survey respondents, 18% were homeowners living in single-family homes. Respondents said they lived in Commerce due to its proximity to their jobs and their appreciation of the "small-town community feel". When asked why the respondents didn't own a home, the only response said that he/she/they could not afford owning a home. Approximately 18 percent of respondents indicated satisfaction with the current condition of their housing situation. Similarly, 9 percent said they were satisfied by their home's current physical condition, while another 18 percent said they were unsatisfied. Additionally, 27 percent of respondents indicated being unsatisfied with the range and variety of housing options in the Commerce.

When asked what type of housing is most needed in the Commerce, a strong preference for more 'single-family homes' was stated. When asked what the most important housing challenge is, four concerns were prioritized:

- Prioritize housing affordability for children growing up in Commerce, who wish to remain in the city when they become adults.
- Focus on developing new housing near commercial locations, further establishing 'live/work' neighborhoods.

- Consider existing housing rehabilitation.
- Establish mortgage loan programs and create support programs which aid homeowners at risk of mortgage default.

When asked where new housing should be located, respondents indicated the City should consider locating housing along major streets (such as Washington Boulevard and Atlantic Boulevard), as well as near the future Montebello/Commerce station, or near existing and planned public transit.

## Responses:

### Housing:

#### 1. Currently, do you...

- 33.3% live in Commerce
- 33.3% live and work in Commerce
- 33.3% work in Commerce
- 0% do not live or work in Commerce

Respondents: 3

#### 2. Which best describes your current living situation?

- 100% live in a single-family home
- 0% live in a duplex/triplex/fourplex
- 0% live in condominium/townhome
- 0% live in an apartment
- 0% live in an accessory dwelling unit (granny flat/guest house)
- 0% live in a mobile home
- 0% live in a group home/assisted living
- 0% live in interim/transitional housing and shelter
- 0% do not currently have a permanent home
- 0% specified "no answer"

Respondents: 3

#### 3. Which best describes your current housing situation?

- 33.3% live in a home they rent
- 33.3% live in a home they own
- 0% live with friends/family, do not own or pay rent
- 0% do not currently have a permanent home
- 9.09% specified "no answer"

Respondents: 3

**4. If you rent, what prohibits you from owning your home?**

- 0% anticipate moving to another city in the near future
- 0% prefer to rent
- 33.3% cannot afford the down payment or mortgage
- 0% stated job instability
- 66.7% specified “no answer”

Respondents: 3

**5. If you live in Commerce, why have you chosen to live here? Mark all that apply.**

- 33.3% said proximity to job
- 0% said to proximity to family and/or friends
- 33.3% said they like the small-town community feel
- 0% said they grew up in Commerce
- 0% said affordability
- 33.3% specified “no answer”

Respondents: 3

**6. Are you satisfied with your current housing situation?**

- 66.7% said yes
- 33.3% said no
- 0% said no opinion

Respondents: 3

**7. Are you satisfied with the physical condition of your home?**

- 33.3% said yes
- 66.7% said no
- 0% had no opinion

Respondents: 3

**8. Are you satisfied with the range and variety of housing options in Commerce**

- 0% said yes
- 100% said no
- 0% had no opinion

Respondents: 3



**10. Indicate the importance of current housing challenges in Commerce?** Respondents ranked their top choices in order of importance, with 1 being the most important.

	Housing Challenges in Commerce					Total Points
	Very Important	Somewhat Important	Not Important	Don't Know	No Answer	
Ensure that children who grow up in Commerce can afford to live in Commerce on their own as adults	2	1				3
Focus new housing near commercial locations, creating "live/work" neighborhoods.	3					3
Streamline the process for new housing construction.	1	1				2
Establish housing for seniors, large families, veterans, and/or persons with disabilities.		2				2
Provide shelters and transitional housing for homeless families and individuals, together along with services that help move people into permanent housing	2					2
Encourage the rehabilitation of existing housing in older neighborhoods.	2	1				3
Support programs to help homeowners at risk of mortgage default to keep their homes, including mortgage loan programs	2	1				3
Targeted efforts to address long-term inequities in the housing market, including discrimination in renting	1	1				2

**11. Indicate the best location for new housing in Commerce.** Respondents ranked their top two choices in order of importance, with 1 being the most important.

	1	2	Total
Along major streets (such as Washington Boulevard and Atlantic Boulevard)	1	2	3
Near the future Montebello/Commerce Station	2	1	3
In existing multi-family neighborhoods	0	0	0
In existing single-family neighborhoods	0	0	0
Scattered throughout Commerce	0	0	0

**12. Indicate the best approach to provide more housing in Commerce.** Respondents ranked their top two choices in order of importance, with 1 being the most important.

	1	2	Total
New housing should be concentrated near existing and planned public transit	1	2	3
New housing should blend in with the character of surrounding neighborhoods.	0	0	0
New housing should be spread evenly across all parts of the city	0	0	0
New housing should be located where it will have the least impact on traffic in Commerce	0	0	0
New housing should be located with easy access to shops, services, and community facilities.	2	0	2
New housing should be located away from truck routes and industry	0	0	0

**13. What else would you like the City to consider when updating Commerce’s Housing Element? (write in response)**

- “Incorporating mixed-use housing developments is important, because Commerce is in need of additional restaurants, markets and recreational amenities like communal public spaces and perhaps a movie house or Performing Arts center.”

**14. How long have you lived in Commerce?**

- 33.3% have lived in Commerce for 21+ years.
- 33.3% have lived in Commerce 11-20 years
- 33.3% do not live in Commerce.

Respondents: 3

**15. Please indicate your gender.**

- 66.7% indicated ‘Female’
- 33.3% indicated ‘Male’

Respondents: 3

**16. How do you identify yourself? (select all that apply)**

- 100% identified as Hispanic/Latino

Respondents: 3

**17. What language is primarily spoken in your household?**

- 100% indicated English

Respondents: 3

**18. What is your age group?**

- 66.7% are between ages 30-49
- 33.3% are between ages 50-64

Respondents: 3

**19. Which zip code do you reside in?**

- 66.7% reside in zip code 90040
- 33.3% indicated 'Other'

Respondents: 3

**20. Which best describes your annual household income?**

- 33.3% indicated between \$50,000 - \$74,999
- 33.3 % indicated between \$75,000 - \$99,999
- 33.3% preferred not to say

Respondents: 3

**21. Do you have children in the house under the age of 18?**

- 66.7% indicated 'Yes'
- 33.3% indicated 'No'

Respondents: 3



Do you live and/or work in Commerce? *¿Vives y/o trabajas en Comercio?*

Live and Work *Vivo y trabajo en Comercio*



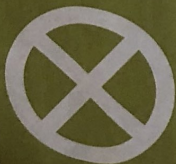
Live Only *Vivo en Comercio*



Work Only *Trabajo en Comercio*



I do not live nor work in Commerce *No vivo, ni trabajo en Comercio*



Or send comments to/  
O enviar comentarios a:

**City of Commerce**

ATTN: Ignacio Rincon

**2535 Commerce Way  
Commerce, CA 90040**

**323.722.4805**

Name/ Nombre: Joe Chaides  
Email/ Correo electrónico: fergusoncommerce@gmail.com

**Comments/ Comentarios:**

The city needs to encourage and make easier for home owners to convert existing square footage for ADU use to provide housing for low income. Our city is aging and there is unused square footage. It should also identify properties where additional housing can be constructed, encouraging homeowners to develop that space

Name/ Nombre: Frank LOPEZ  
Email/ Correo electrónico: FJLFLOPEZ@GMAIL.COM

O enviar comentarios a:

**City of Commerce**

ATTN: Ignacio Rincon

**2535 Commerce Way  
Commerce, CA 90040**

**323.722.4805**

**Comments/ Comentarios:**

The speaker is very knowledgeable of the concept. The slides <sup>are</sup> very thorough. However, as a resident, I'd benefit from a functional mission statement for the housing element. I ~~that~~ found the Key Housing Programs to be very important but I left confused how these programs address the housing constraints.

# WHERE SHOULD HOUSING GO

- MAP SHOWS HCD  
WHERE CAN POSSIBLY GO

- NEW CONST. TARGET ABOVE M

- IS CITY GOING TARGET APTD,

- CONVERSION ~~EXCUS~~

- HOUSING OVERLAY -

CITY EFFORT FOR MU →  
BAPP HSG DEL

WANT TYPE OF HSG



HSG. OVERLAP

- AFFD. DEV. HAS  
FIRST OPPOR.

CITY ~~BY~~ NEAR J. BOX  
BUSER KING - CITY  
OWNS.

INCREASE SENIOR  
HOUSING.

## Commerce Public Outreach May 30, 2023 Workshop and Comments

The Draft Housing Element was available for public review from May 25, 2023 through June 26, 2023. The City also held a community workshop on May 31, 2023 to review the Draft Housing Element and to receive public input. The workshop materials are included in Appendix A.

Comments received during the workshop are included below. The italicized text shows how these issues are addressed in the Housing Element:

- New construction targets above moderate housing. Is the City going to target affordable housing? *Yes, the sites inventory includes potential units for moderate, low and very low income housing.*
- Conversion of existing housing equals ADUs. *The City's current ADU standards include provisions for ADUs and a program in the Housing Element calls for the ADU Ordinance to be updated to the most recent State requirements. Also, as part of the AFFH program (Program 5.1), the City will create an information sheet/brochure on ADUs. This will include information on building requirements and the permitting process.*
- Housing Overlay – City effort for mixed use should result in affordable housing development; affordable development has first offer. *With the update to the General Plan, the Housing Overlay is no longer a necessary tool.*
- Sites near Jack-in-the-Box and Burger King are City owned – *The Jack-in-the-Box site is City owned and is included in the sites inventory for mixed use development.*
- Increase senior housing – *Several programs in the Housing Element propose a variety of housing types to meet the needs of seniors. These include Program 1.3 (Accessory Dwelling Units), Program 1.4 (Extremely Low-Income and Special Needs Housing) and Program 1.5 (Alternative Housing Models).*
- The City needs to encourage and make it easier for home owners to convert existing square footage for ADU use to provide housing for low income residents. *Programs 1.3 and 5.1 address how the City will comply with the most recent State laws regarding ADUs and ways to advertise the ADU development process on the City website and Community Development Department.*
- The City should identify properties where additional housing can be constructed, encouraging homeowners to develop that space. *Program 3.4 addresses SB 9, which allow lot splits in the R-1 zone. The Program calls for the City to amend the Zoning Ordinance to process SB 9 applications at the ministerial (Department Director) level.*
- A functional mission statement for the Housing Element would be helpful. *As described in the Introduction Chapter of the Element:*

*The Housing Element establishes the City's housing policies for the planning period of October 15, 2021 through October 15, 2029. It guides City officials in decision making and sets forth an action plan to implement the housing goals. This Housing Element is intended to direct residential development and preservation in a manner consistent with the Commerce General Plan and overall requirements of the State Housing Element law.*

- The programs were very important but it was confusing as to how they address the housing constraints. *The Constraints chapter of the Element describes how the programs address issues, including special needs housing, affordability, etc.*

# APPENDIX B: REVIEW OF 2014 HOUSING ELEMENT

## Overview

Under State Housing Element law, communities are required to assess the achievements under their adopted housing programs as part of the periodic update to their housing elements. These results should be quantified where possible (e.g., the number of units rehabilitated), but may be qualitative where necessary (e.g., mitigation of governmental constraints). The results should then be compared with what was projected or planned in the earlier element. Where significant shortfalls exist between what was planned and what was achieved, the reasons for such differences must be discussed.

The City of Commerce 2014-2021 Housing Element set forth a series of housing programs with related goals for the following areas:

- Conservation of the City's Existing Housing Stock
- Increase Affordable Housing Opportunities
- Removal of Constraints to New Housing Construction
- Equal Housing Opportunity
- Identify Adequate Sites to Achieve Housing Variety

This section reviews the City's progress to date in implementing these housing programs and their continued appropriateness for the 2021-2029 Housing Element. **Table B-1** summarizes the City's housing program accomplishments, followed by a review of its quantified objectives (**Table B-6**). The results of this analysis will provide the bases for developing the comprehensive housing program strategy for the 2021-2029 Element.

## Cumulative Impacts on Addressing Housing for Special Needs

The City addressed housing needs of special populations through the following [that](#) include:

- Neighborhood Fix Up Grant and CDBG Home Preservation Grant programs which benefit many senior homeowners.
- [Modelo Specific Plan that provides a mix of unit sizes, especially larger homes for multigenerational living.](#)
- [ADU regulations that allow for smaller and more affordable options for lower income households and those with special needs.](#)



The City was not particularly effective in addressing the housing needs of special needs groups due to a number of reasons:

- Lack of specific program actions in the 5<sup>th</sup> cycle Housing Element
- Lack of funding and staffing to implement programs

Due to funding and staffing challenges, some programs were not successful. As part of the 2021-2029 Housing Element update evaluates realistically the City's financial ability to implement housing assistance programs. The update focuses on incentivizing the private market, the City will explore other actions to expand housing opportunities for special needs populations. These include:

- Program 1.4 – Extremely Low Income and Special Need Housing
- Program 1.5 – Alternative Housing Models
- Program 3.5 – Incentives for Affordable Units for Large Households and Multigenerational Households

In addition, the Neighborhood Fix-Up Grant benefits many extremely low income and elderly households.

**Table B-1: Evaluation of 2014-2021 Housing Element Programs**

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 1.1 - Code Enforcement Program.</b> The objective of the City's Code Enforcement Program is to bring substandard housing units into compliance with City codes. Potential code violations are identified based on exterior windshield surveys and complaints reported to the City.</p>	<p>To maintain and improve the condition of the City's existing housing stock and promote the use of established City programs for rehabilitation and revitalization of housing units in the City. Corrections will be addressed on a case by case basis.</p>	<p>The City currently conducts windshield surveys and addresses complaints on an ongoing basis. Throughout the planning period the City addressed 3,200 violations including: 292 violations in 2014, 421 violations in 2015, 522 in 2016, 386 in 2017, 206 in 2018, 205 in 2019, 717 in 2020 and 449 in 2021. This is an average of 400 violations addressed per year. When appropriate code enforcement officers referred residents to the Substantial Housing Rehabilitation Loan Program, CDBG Home Preservation Grant Program, Neighborhood Fix Up Grant Program, and the Environmental Rehabilitation Program. Between 2014 and 2021, approximately 37 property owners with code enforcement cases were assisted through the City's Home Preservation Grant or Neighborhood Fix-Up Grant Programs.</p>	<p>This program is continued in the 2021-2029 Housing Element, <u>including conducting window surveys every two years to determine housing units that are in need of rehabilitation and repairs.</u></p>

**Table B-1: Evaluation of 2014-2021 Housing Element Programs**

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 1.2 – Substantial Housing Rehabilitation Loan Program.</b> The program provides deferred loans of up to \$100,000 for the rehabilitation of owner-occupied single-family homes.</p> <p>The elimination of the Commerce Community Development Commission resulted in the loss of a permanent funding source for this program.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to encourage residents to utilize the program.</p>	<p>On an annual basis the City administers loans between \$50,000 and \$100,000 to substantially rehabilitate units and in return property owners are required to put affordability covenants in place. During the planning period the City was able to achieve their objectives and assist 3 households with substantial rehabilitation loans. The units assisted were rehabilitated and affordability covenants put in place to preserve the units as affordable to low income households for 45 years. Units that utilized \$100,000 loans will be counted as “substantial rehab” project units towards the City’s required housing allocation consistent with HCD requirements.</p>	<p>Due to limited funding, program was discontinued. No funding has been found for this program. <a href="#">This program is not continued in the 2021-2029 Housing Element.</a></p>

**Table B-1: Evaluation of 2014-2021 Housing Element Programs**

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 1.3 – Environmental Rehabilitation Program.</b> The Environmental Rehabilitation Program will provide grant assistance up to \$30,000 to address the negative air quality and noise impacts created by the operation of the rail road yards and freeways within the City. This program targets those households with very low- or low-incomes.</p> <p>This program was historically funded by the Redevelopment Agency Low and Moderate Income Housing Fund (“Housing Set-Aside Funds”), however the elimination of the Commerce Community Development Commission in the previous planning period, resulted in the loss of a permanent funding source for this program.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to encourage residents to utilize the program.</p>	<p>No funding was identified for this program.</p>	<p>This program is removed from the 2021-2029 Housing Element.</p>
<p><b>Program 1.4 - Neighborhood Fix Up Grant Program.</b> The Neighborhood Fix Up Grant Program provides up to \$1,000 for housing repairs and alterations that are visible from the street.</p> <p>This program was historically funded by the Low and Moderate Income Housing Fund (“Housing Set-Aside Funds”), however the elimination of the Commerce Community Development Commission in the previous planning period, resulted in the loss of a permanent funding source for this program</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to encourage residents to utilize the program.</p>	<p>Funded through Measure AA, the Neighborhood Fix-Up Grant Program provided financial assistance to residents for minor improvements to their homes. The Program provided funding for the cost of materials associated with eligible home exterior upgrades that are visible from the street or public right-of-way. Between 2014 and 2021, approximately 96 homes were assisted through the Neighborhood Fix-Up Grant Program.</p>	<p>This program continues to be appropriate and is included in the 2021-2029 Housing Element <a href="#">with the goal of assisting 100 households during the 8-year planning period. The updated program also includes- creating informational brochures to advertise the program.</a></p>

**Table B-1: Evaluation of 2014-2021 Housing Element Programs**

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 1.5 – CDBG Home Preservation Grant Program.</b> The CDBG Home Preservation Grant Program provides up to \$25,000 to qualified applicants to complete improvements to their residence. The Program addresses substandard housing conditions promotes property maintenance by providing residential rehabilitation grants to qualified low- and moderate-income residents living in single-family owner-occupied dwellings</p>	<p>Provide \$60,000 in available funding to assist approximately 3 households annually.</p>	<p>From 2014 through 2021, a total of \$1,083,507 was allocated for the City’s Home Preservation Grant Program. During that time, the City assisted between 3 to 6 households annually.</p> <p>The City’s website includes information on the grant program’s guidelines as well as an interest form for residents to fill out and submit to the Economic Development and Planning Department.</p>	<p>This program continues to be appropriate and is included in the 2021-2029 Housing Element <u>with the goal of assisting an average of five households annually.</u></p>

**Table B-1: Evaluation of 2014-2021 Housing Element Programs**

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 1.6 - Monitor and Preserve Affordable Housing.</b> The City will inventory and gather information to establish an early warning system for publicly assisted housing projects that have the potential to convert to market rate.</p>	<p>Maintain their AB 987 database to include detailed information on all subsidized units, including those that have affordability covenants. The database will indicate the expiration date of any covenant and any requirements governing reimbursement.</p> <p>The City will also continue to monitor at-risk developments throughout the planning period. Once the City receives notice of a potential conversion of the federally assisted units, the Housing Division will contact the owners to ascertain what will be required to extend the participation of these projects in the HUD 221 program.</p> <p>The City will strive to maintain all existing affordable rental units by monitoring their affordability and contacting property owners to discuss options for long term affordability.</p>	<p>The City maintains a number of affordable units through existing deed restrictions. No rental units were at-risk of conversion to market rate during the planning period. An inventory of affordable units will be kept up-to-date by Staff to monitor affordable units throughout the planning period and update the list with new deed restricted properties that are developed during the planning period.</p>	<p>This program continues to be appropriate and is updated and included in the 2021-2029 Housing Element <a href="#">to pursue available state and federal funding to preserve affordable units as well as continuing to have affordable housing agreements filed with the land to ensure the long-term affordability of units.</a> -</p>

**Table B-1: Evaluation of 2014-2021 Housing Element Programs**

<b>Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.</b>			
<b>Description of Previous Housing Element Program</b>	<b>Objective</b>	<b>Progress and Effectiveness</b>	<b>Appropriateness</b>
<p><b>Program 1.7 – Energy Efficient Design.</b>                      The City will review ordinances and recommend changes where necessary to encourage energy efficient housing design and practices that are consistent with state regulations.</p>	<p>The Housing Division will advertise the appropriate information related to this program on the City’s website. In addition, the Planning Division and code enforcement personnel will refer potential applicants to the Housing Rehabilitation Program or the Neighborhood Fix-up Grant Program as potential funding sources.</p>	<p>The City currently provides information on energy efficiency programs on their website and at City Hall. When appropriate, City Staff and code enforcement officers, direct residents to apply for applicable programs. Additionally, the City encourages all new development to be energy efficient and to take into consideration LEED standards.</p>	<p>Implementation of the Building Code energy efficiency requirements is not included in the 2021-2029 Housing Element as a housing program.</p>



**Table B-2: Evaluation of 2014-2021 Housing Element Programs**

Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 2.1 – First Time Homebuyer Program.</b> This Program was intended to operate in conjunction with the Substantial Housing Rehabilitation Loan, by providing residents the opportunity to apply for assistance to purchase homes acquired and rehabilitated by the City. Residents were also allowed to identify a non-City owned residence and apply for rehabilitation and financial assistance. To further homeownership opportunities the City of Commerce also partners with the Los Angeles County Housing Authority to assist Commerce residents currently on the County’s Section 8 waitlist.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to encourage residents to utilize the program.</p>	<p>The City offered first-time homebuyer assistance to nine households in conjunction with the Rosewood Village project. Up to \$150,000 in secondary financing was offered to nine first-time homebuyers. Application deadline was May 2022. The Modelo Specific Plan also commits to providing 85 units as housing affordable to middle income households.</p>	<p>This program is updated and included in the 2021-2029 Housing Element. <a href="#">In addition to the homebuyer assistance for the Modelo Specific Plan project, the updated program includes advertising the program with the City’s Library Social Services Division and pursue funding from state and federal programs.</a></p>
<p><b>Program 2.2 - (Senior and Handicapped) Rent Subsidy Program</b> The program provides subsidies to eligible households with residents that are at least 57 years of age or are physically handicapped. The prospective applicant must also qualify as low- or very low-income. The maximum monthly subsidy for a qualified household is \$200.</p> <p>The City previously utilized redevelopment set-aside monies to provide rent vouchers to seniors and handicapped residents. With the dissolution of the Commerce Community Development Commission, the City has allocated money from their General Fund to continue the program, but has reduced and limited the number of recipients.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to increase awareness and solicit additional applications.</p>	<p>The City did not find a permanent funding source for this program.</p>	<p>Funding for rent subsidies is limited. This program is not included in the 2021-2029 Housing Element.</p>

**Table B-2: Evaluation of 2014-2021 Housing Element Programs**

Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 2.3 – Los Angeles County Partnership.</b> As a means of further leveraging housing assistance, the City will cooperate with the Los Angeles County Community Development Commission (CDC) and Los Angeles County Housing Authority to promote resident awareness and application for County run housing assistance programs.</p>	<p>Increase resident awareness about housing programs offered by the County by providing information at City Hall, on the City’s website and in other public places to increase awareness</p>	<p>The City continues to participate in programs available through LACDA.</p>	<p>This program is updated in the 2021-2029 Housing Element <u>and includes providing a link to the programs offered by LACDA on the City website.</u> -</p>

**Table B-3: Evaluation of 2014-2021 Housing Element Programs**

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 3.1 – Housing Opportunity Overlay Program.</b> During the 2008-2014 planning period, the City established a new Housing Opportunity Overlay in the 2020 General Plan to facilitate the transition of existing non-residential uses to new residential development.</p> <p>To finalize the creation of the overlay, the City has established the development process required to implement the overlay area, including the creation of development standards and design guidelines. In developing the guidelines and standards the City plans to ensure that the development of high density, multifamily, affordable housing is allowed and encouraged.</p>	<p>Facilitate the redevelopment of underutilized sites by identifying housing opportunity sites. Approach land owners and business operators in the overlay area to discuss the future transition of uses. Provide information to interested developers about potential residential opportunity sites.</p>	<p>The Rosewood Village program provides 133 units through the Housing Opportunity Overlay program.</p>	<p>With the General Plan update, the City has identified appropriate locations for facilitating housing development in the future through various mixed use designations. The Overlay is no longer needed to facilitate the transition of industrial uses to housing.</p>

**Table B-3: Evaluation of 2014-2021 Housing Element Programs**

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 3.2 - Atlantic Blvd. Housing Program.</b> In the 2020 General Plan, a Mixed-Use designation along the Atlantic Boulevard corridor between the Mixmaster (on the north) and Washington Boulevard (on the south) was created. This land use designation provides for both residential development and commercial development.</p>	<p>The City will develop standards and design guidelines for the Mixed Use Overlay in the City's Zoning Ordinance. The City will maintain an inventory of opportunity sites along Atlantic Boulevard and provide information about development opportunities and the development standards established for the overlay.</p> <p>The City will contact developers in the area to inform them of opportunity sites, the established development standards, and other pertinent information. The City may also publish information online and at City Hall about the Atlantic Boulevard Housing Program.</p>	<p>The City is updating its General Plan. Design guidelines will be included as part of the General Plan and Zoning Ordinance update.</p>	<p>This is included in the 2021-2029 Housing Element, as part of the General Plan update <a href="#">that will include updated design guidelines.</a></p>

**Table B-3: Evaluation of 2014-2021 Housing Element Programs**

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 3.3 - Lot Consolidation Program.</b>                      Parcels located in specific areas of the City within the Housing Opportunity overlay and along Atlantic Boulevard tend to be narrow and shallow in size, which can act as a constraint to the development of larger housing projects. To encourage the development of higher density residential and mixed-use projects on vacant and underutilized sites, the City offers incentives to encourage lot consolidation.</p>	<p>The City will notify housing developers of development incentives and opportunities for lot consolidation.</p>	<p>The City has provided info about lot consolidation to promote Housing Overlay.</p>	<p>This program is included in the 2021-2029 Housing Element <u>and has been updated to include incentives for lot consolidation, notify housing developers of new development incentives and for the City to consolidate City-owned parcels to create six developable sites.</u></p>
<p><b>Program 3.4 - Density Bonus Program</b>                      The City will evaluate its density bonus provisions as part of the Zoning Ordinance revisions that will be required to implement the General Plan. In the event it is not in conformance with current State requirements, the Density Bonus section of the City's Zoning Ordinance will be revised.</p>	<p>To increase the number of affordable units throughout the City in new housing developments. The Density Bonus will be emphasized in future development within the Housing Opportunity Overlay Areas.</p>	<p>While the City has not updated its Density Bonus Ordinance since 2014, the City continues to offer density bonus for lower and moderate income housing consistent with State law.</p> <p>Modelo and Rosewood Village both utilized specific plan as a tool for development. Middle income housing units (up to 175 AMI) are made available through development agreement.</p>	<p>This program is included in the 2021-2029 Housing Element as part of the Zoning Ordinance amendments <u>that will reflect recent changes to state law.</u></p>

**Table B-3: Evaluation of 2014-2021 Housing Element Programs**

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 3.5 - Streamlined Processing.</b> The City continues to monitor permit processing times to ensure the fastest possible turnaround for applications and identify any impediments to affordable housing. Additionally, the processing time of applications for new construction or rehabilitation of housing for lower and moderate-income households and seniors will be prioritized.</p>	<p>Continue to monitor permit processing times and investigate ways to streamline the process. Prioritize the review of projects that include affordable housing units.</p>	<p>The City continues to prioritize processing for affordable and senior housing. Also the creation of new mixed use zones will eliminate the requirement to pursue residential and mixed use developments through the Housing Opportunity Overlay.</p>	<p>This program is included in the 2021-2029 Housing Element- <a href="#">and includes updating the Zoning Code to facilitate ministerial approvals for lot splits in the R-1 zone and to prioritize the review of projects that include affordable housing units.</a></p>
<p><b>Program 3.6 – Incentives for Large Multi-Family Units.</b> Review the Zoning Ordinance to determine what incentives and/or regulations can be implemented as a means to promote the development of rental housing with three or more bedrooms. As part of the Housing Opportunity Overlay the City has also included development standards to encourage and facilitate an increased number of larger units. The requirements for mixed-use housing are applicable to both rental and owner occupied housing.</p>	<p>To increase the number of affordable multi-bedroom units to accommodate larger low-income families</p>	<p>The City facilitates multigeneration housing. The Modelo Specific Plan offers a range of unit sizes.</p>	<p>This program is included in the 2021-2029 Housing Element <a href="#">and includes developing incentives to promote the construction of rental and ownership housing with three or more bedrooms and to pursue affordable housing for larger households using City-owned properties.</a> -</p>

**Table B-3: Evaluation of 2014-2021 Housing Element Programs**

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 3.7 – Residential Development Standards</b>                      Review the development standards for the R-1, R-2, and R-3 zones to identify standards that may constrain the development of affordable housing and housing for disabled individuals. Specifically, Staff will review requirements such as the minimum unit size, property line setbacks, parking requirements, height restrictions, etc. to ensure that they are necessary and pertinent.</p>	<p>Review development standards to identify constraints and remove or offset constraints where possible.</p>	<p>Much of the future residential growth is expected to occur within the new mixed use designations proposed by the General Plan update. The Zoning Ordinance update will establish appropriate development standards to facilitate multi-family and mixed use development in these new designations.</p>	<p><del>This program is incorporated with the Adequate Sites for RHNA program in the 2021-2029 Housing Element. This program has been updated to update the Zoning Ordinance to comply with state law regarding emergency shelters and low-barrier navigation centers, transitional and supportive housing and large residential care facilities among others.</del></p>
<p><b>Program 3.8 – Accessory Dwelling Unit (Second Unit) Ordinance.</b> Ensure that the second unit ordinance complies with State law and promote the ordinance to homeowners and property managers.</p> <p>Encourage residents that have illegally constructed a second unit on their property to bring existing illegal units into compliance with City zoning and building codes. The City may recommend that homeowners apply for assistance through existing rehabilitation programs.</p>	<p>Encourage the construction of 5 units over the planning period. To facilitate use of the ordinance the City will provide informational materials about the second unit ordinance at City Hall, on the City’s website and in other public places to increase awareness.</p>	<p>During the planning period, five accessory dwelling units were permitted.</p>	<p>This program is expanded in the 2021-2029 Housing Element <u>that will. reflect recent changes to state law, developing an informational brochure, developing incentives to encourage development of ADUs, hold quarterly workshops and facilitate the construction of 16 ADUs during the planning period. .</u></p>



**Table B-3: Evaluation of 2014-2021 Housing Element Programs**

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 3.9– Off Site Improvements.</b> Provide opportunities for public, private and non-profit groups to develop affordable housing by constructing off-site improvements and physical infrastructure as Capital Improvement Projects.</p>	<p>Facilitate easier development of affordable housing by allowing improvements to be negotiated.</p>	<p>The City continues to offer off-site improvements on a case-by-case basis to facilitate affordable housing.</p>	<p>This program is included in the 2021-2029 Housing Element <a href="#">with the same provisions as the 2014-2021 Housing Element.</a> -</p>
<p><b>Program 3.10 – Water and Sewer Service Providers.</b> Ensure compliance with Government Code Section 65589.7- the City must deliver a copy of the 2014-2021 Housing Element to all public agencies or private entities that provide water or sewer services to properties within the City of Commerce.</p>	<p>Ensure that water and sewer providers are aware of the City's intentions for residential development throughout the City.</p>	<p>A copy of the 2014-201 Housing Element was delivered to all water and sewer providers.</p> <p>An EIR was prepared for the Modelo residential project and the Rosewood Village project. These EIRs included analysis of water and sewer capacity for the residential units.</p>	<p>This program is included in the 2021-2029 Housing Element <a href="#">and a copy of the Element will be provided to water and sewer providers.</a>-</p>
<p><b>Program 3.11 - Flood Management</b> Continue to utilize information from the General Plan and consider flood risks in all future land use decisions.</p>	<p>Ensure that flood risks are considered when making land use decisions.</p>	<p>Review of flood risks is part of the planning and development engineering review process for residential projects.</p>	<p>This is not a housing program and is not included in the 2021-2029 Housing Element.</p>

**Table B-4: Evaluation of 2014-2021 Housing Element Programs**

Goal 4: Promote equal housing opportunity for all residents.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 4.1 – Reasonable Accommodation Program for Disabled.</b> Ensure that sufficient provisions are in place by the City to facilitate a resident’s request for “reasonable accommodation.”</p>	<p>Administer City operated programs to assist disabled households with architectural modifications to their homes and continue to implement the provisions of the Americans with Disabilities Act (ADA). Provide information in public places regarding the City’s reasonable accommodation ordinance and make information on this program more widely available to residents. Referrals will be made whenever possible.</p>	<p>The City continues to offer reasonable accommodation to facilitate housing for persons with disabilities.</p>	<p>The City will remove subjective condition for reasonable accommodation approval. This is included in the Zoning Ordinance Amendments program.</p>
<p><b>Program 4.2 – Fair Housing Program.</b> The City will continue to contract with the Housing Rights Center to provide residents with fair housing services using Community Development Block Grant (CDBG) funds.</p>	<p>Comply with all State and federal fair housing requirements when implementing housing programs or delivering housing-related services.</p>	<p>The City assisted in program outreach through placement of fair housing program brochures in both English and Spanish at the public counter, City library, post office, and other community locations such as the City’s senior center.</p>	<p>The fair housing program is expanded in the 2021-2029 Housing Element to comply with AB 686 (Affirmatively Furthering Fair Housing).</p>

**Table B-4: Evaluation of 2014-2021 Housing Element Programs**

Goal 4: Promote equal housing opportunity for all residents.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Action 4.3 – Housing for Developmentally Disabled Persons Program.</b> To accommodate residents with developmental disabilities the City will seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities.</p> <p>Provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals, to projects targeted for persons with disabilities, including persons with developmental disabilities</p> <p>Reach out annually to developers of supportive housing to encourage development of projects targeted for special needs groups.</p> <p>Finally, as housing is developed or identified, Commerce will work with the Eastern Los Angeles Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities.</p>	<p>The City will continue to offer specific regulatory incentives throughout the planning period, when funding is available, apply for funding at least twice during the planning period to encourage development of unit specifically for persons with disabilities, will reach out annually to developers, and will initiate a cooperative outreach program with the Regional Center by 2014.</p>	<p>The city provides priority processing, reasonable accommodation, and potential funding/infrastructure improvements to support housing for lower and moderate income households and households with special needs, including persons with disabilities.</p>	<p>This is not included as a separate program in the 2021-2029 Housing Element.</p>

**Table B-5: Evaluation of 2014-2021 Housing Element Programs**

Goal 5: Identify adequate sites to achieve housing variety.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 5.1 – Ensure Adequate Sites to Accommodate the RHNA.</b> To ensure sufficient residential capacity to accommodate the identified regional need for lower-income households is maintained within the Housing Opportunity Overlay, the City will develop and implement a formal monitoring.</p> <p>The program will track development approvals on identified sites and for those that result in a reduction of potential affordable units below the residential capacity assumed in Table 6-6, the City will identify and designate additional sites to rezone to ensure that no net loss occurs.</p>	<p>Continue to provide appropriate land use designations and maintain an inventory of suitable sites for residential development. Make the vacant and underutilized residential sites inventory available to non-profit and for-profit housing developers on the City’s website whenever possible.</p>	<p>The City was able to facilitate the development of a significant number of new units through Rosewood Village and Modelo specific plans.</p>	<p>This program is updated to reflect the City’s new RHNA in the 2021-2029 Housing Element. <a href="#">Updated objectives include redesignating City-owned nonvacant sites for residential mixed-use development, maintaining an inventory of available sites online, complying with SB 166 and issuing Requests for Proposals for City-owned sites</a></p>
<p><b>Program 5.2 – Extremely Low-Income and Special Needs Housing.</b> Ensure that the Zoning Code is updated to be consistent with SB2 provisions and implemented concurrent with Housing Element adoption.</p> <p>Assist in the development of housing to meet the needs of extremely low-, very low- and low-income households.</p> <p>The City prioritizes funding opportunities to ensure that extremely low- and very low-income housing are given precedence and are able to easily access the financial and regulatory incentives offered by the City.</p>	<p>Monitor available sites for the development of emergency, transitional and supportive housing.</p>	<p>The City created affordable housing for its workforce through the Rosewood Village and Modelo specific plans.</p>	<p>The City will continue to facilitate lower income and special needs housing. This program is included in the 2021-2029 Housing Element <a href="#">and includes establishing incentives and appropriate development standards that can be implemented to encourage development of housing for lower income households.</a></p>

**Table B-5: Evaluation of 2014-2021 Housing Element Programs**

Goal 5: Identify adequate sites to achieve housing variety.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p><b>Program 5.3 – Alternative Housing Models.</b> Encourage through development incentives the provision of more innovative housing types that may be suitable for the community, including community care facilities, supportive housing, and assisted living for seniors</p>	<p>Facilitate the development of alternative housing models suited to the community housing needs through the provision of flexible zoning regulations. Continue to provide appropriate standards to encourage development of senior housing to meet the needs of the City's growing senior population.</p>	<p>The City continues to encourage a variety of housing in the community. The General Plan update offers increased opportunities for multi-family and mixed use housing.</p>	<p>This program is included in the 2021-2029 Housing Element. <u>As part of the comprehensive Zoning Ordinance update, incentives and appropriate development standards will be established that can be implemented to encourage development of alternative housing models.</u></p>

**Table B-6: Summary of RHNA Progress (2014-2021)**

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Subtotal Affordable Units	Above Moderate Income	Total
Accessory Dwelling Units	0	0	0	0	0	5	5
Attached Townhomes (Rosewood Village)	0	0	0	0	0	31	31
<b>Total Units</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>36</b>	<b>36</b>
Regional Fair Share Housing Need 2014-2021	6	6	7	7	26	20	46
<b>Percent of RHNA Met</b>	0%	0%	0%	0%	0%	180%	78%

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# APPENDIX C: SITES INVENTORY

## METHODOLOGY

In developing the sites inventory for the City of Commerce, we used a multi-tier approach to identify parcels or “sites” with the best potential for development/redevelopment over the next eight years.

### Strategies for Meeting RHNA

The following are factors considered in parcel selection for the sites inventory:

1. Approved units in Modelo Specific Plan;
2. City-owned properties that have been identified for future residential development;
3. Non-City-owned vacant sites and parking lots;
4. Non-City-owned nonvacant sites that met at least three of the following factors:
  - a. Owned by the same owner that will facilitate lot consolidation,
  - b. Existing uses that are similar types of uses being recycled in Commerce and surrounding cities;
  - c. Building age is at least 30 years or building is vacated. Buildings older than 30 years often require significant improvements to update the systems and difficult to meet ADA requirements as warranted with substantial rehabilitation;
  - d. Existing Floor Area Ratio (FAR) that is less than 0.50;
  - e. Improvement to Land Ratio (ILR) of less than 1.0, indicating the land is worth more than the structures on site. However exceptions to the rule are sites with large structures such as older shopping centers, office buildings, motels, and warehouses. Often these high improvement values may serve as financial liability to property owners if the uses are not generating adequate revenues but are still subject to high property taxes.
  - f. Property is in obvious condition of deferred maintenance.



## Recent Development Trends

In selecting sites appropriate for development or redevelopment over the sixth cycle Housing Element, the City reviewed recent projects in the City and surrounding communities (Table C-1). For density assumptions in the site inventory, the proposed density ranges in the General Plan Update (Land Use Element) were considered. The proposed R2 land use designation will change from 0 to 17 du/ac to 11.1 to 17 du/ac and the R3 land use designation will change from 0 to 27 du/ac to 17.1 to 27 du/ac. Given these alterations, the lower range of these ranges were assumed: 12 du/ac in the medium density residential zone and 20 du/ac in the high density residential zone. The proposed densities for the General Plan Update new land use categories are 40 to 80 du/ac. Based on recent projects, a conservative assumption of 50 du/ac for mixed use zones was applied. For the affordability break down, assumptions included 50 percent lower income, 25 percent moderate income and 25 percent above moderate income for sites that are city-owned.

**Table C-1: Recent Development Trends in Commerce and Neighboring Cities**

Address	City	Year Approved/ Constructed	Acres	Previous Use	Proposed/Approved Use and Zone	Density
<b>Townhomes</b>						
5625 Jillson Street (Rosewood Village - Site 1B)	Commerce	2020/ 2021	1.33	19,629 sq. ft. (1 1/2 stories) light industrial, warehouse and office bldg. Built in 1949	Attached single family homes/townhomes	23.3
5550 Harbor Blvd (Rosewood Village Site 1A)	Commerce	2020/ Building Permit Review	1.98	27,376 sq. ft. office building (1 1/2 stories), parking lot for Aquatic Center. Built in 1956	Attached single family homes	18.6
5555 Jillson Street (Rosewood Village Site 2)	Commerce	2020/ Waiting for Plan Check Submittal	2.43	City of Commerce Transportation Center office building, maintenance bays and 2-story parking structure. Built in 1997	Attached single family homes	26.7
<b>Less 1/2 acre</b>						
5953 Florence Ave	Bell Gardens	Plan check	0.27	Vacant parking lot	4 Condos (Above Mod)	14.8
1018 W. Olympic Ave	Montebello	Pipeline Project	0.40	Parking lot	24 units (8 moderate) C-2 zone (changing to Mixed Use)	60
2000 Flotilla St	Montebello	Pipeline Project	0.49	Parking lot	25 units (Very Low) Industrial zone (changing to res)	51
<b>Over 1/2 acre</b>						
8000 Bell Gardens	Bell Gardens	Entitled	2.17	Vacant lot - R3 zone	48 Condos (Above Mod)	22.1
6231 & 6301 Eastern Ave	Bell Gardens	Application Submitted	0.68	Chiropractor office, single-family home, & vacant commercial bldg. Built in 1948 and 1949. FAR = 0.13, ILR = 0.06	16 Condos (Above Mod) & retail	23.5
7940 Telegraph Road	Downey	2016/ Completed	1.60	Parking Lot - C-2/P-B zone (Site rezoned to R-3)	39 units	

2021-2029 Housing Element

Address	City	Year Approved/ Constructed	Acres	Previous Use	Proposed/Approved Use and Zone	Density
8150 Third Street	Downey	2016/ Completed	1.0 (consolidation of 4 lots)	Two lots - single-family homes, two lots were parking lots	28 units in Downtown Res SP	
9553 Firestone Blvd	Downey	2016/ Completed	1.1 (consolidation of 5 lots)	8 (non-conforming) residential uses - C-2/P-B zone	39 units	35.4
116, 128, 129, 133, 136 N. Poplar Ave	Montebello	Entitled	2.00	Residential uses (zoning is being changed to mixed use)	156 units (55 moderate income)	Project A - (140 units at 82 du/ac); Project B - (16 units at 56 du/ac)
112-132 6th St., 501-525 Whittier Blvd.	Montebello	Pipeline project	1.56	Retail, Vacant, Residential	132 (61 very low, 33 low, 13 mod, 25 above mod); Residential zone (changing to mixed use)	84.6

Sources: *City of Bell Gardens Housing Element, adopted July 2022*  
*City of Downey Housing Element, adopted October 2022*  
*City of Montebello Housing Element; adopted June 2022*  
*City of Commerce Economic Development and Planning Department*

## Current Zoning and Environmental Conditions in Commerce

The City of Commerce is a built-out city in the heart of Los Angeles County. As shown on Figure C-1, the primary land designations are for commercial and industrial uses. In order to meet the residential demands of the city, Commerce is updating the General Plan to allow for further housing opportunities. Once the General Plan Update is adopted, the Zoning Code will also be updated to ensure consistency.

As described in the Housing Resources Chapter of this Element, the City is proposing two mixed-use land use designations that will include residential uses. These are:

- **Mixed Use Atlantic:** this designation will apply to the parcels in the City that are currently in the Atlantic Mixed Use General Plan land use designation along Atlantic Boulevard. The proposed density is 40 to 85 dwelling units per acre.
- **Mixed Use Washington 1:** this designation will allow a variety of uses for parcels located along Washington Boulevard and has a proposed density of 40 to 85 dwelling units per acre.

Many of the proposed sites in the Housing Element inventory are adjacent to or in close proximity to residential uses or public facilities such as parks or city municipal facilities.

The City has also established the Housing Opportunity Overlay (HOO) zone to be applied to discontinued heavy industrial uses.



Figure C-1: City of Commerce Zoning



Source: City of Commerce





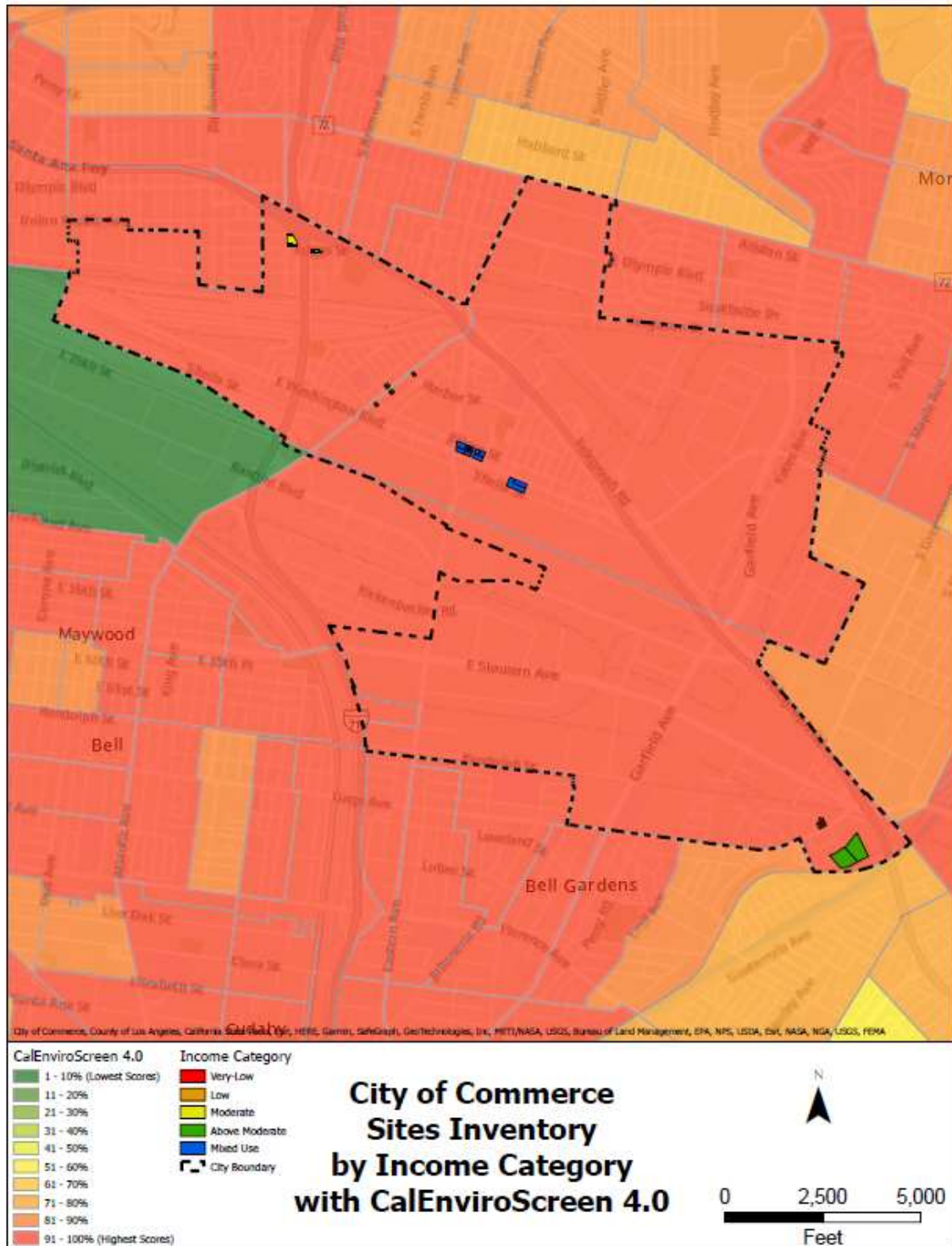
Due to Commerce’s location in the Gateway Cities region of Los Angeles County, pollution and other environmental concerns are factors in land use decisions. As described in Appendix D, Affirmatively Furthering Fair Housing, of this Housing Element, the California Office of Environmental Health Hazard Assessment (OEHHA) compiles CalEnviroScreen 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. As shown Figure C-2, the CalEnviroScore 4.0 are based on percentiles and show that all tracts in Commerce have the highest (worst) scores for pollution and other environmental hazard exposures. In May 2022, the California Environmental Protection Agency (CalEPA) released maps of communities considered to be disadvantaged communities based on four categories.<sup>1</sup> One of those categories is census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0. All of Commerce is considered a disadvantaged community according to these scores (Figure C-3).

Due to the environmental constraints across the city, the inventory of sites does not put any proposed location at a greater or less disadvantage than others. The City is currently developing an Environmental Justice Element as part of the General Plan. With the gradual recycling of obsolete/discontinued industrial properties into residential and mixed use developments, the City facilitates the remediation of environmental hazards on some of these properties.

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<sup>1</sup> California Office of Environmental Health Hazard Assessment, SB534 Disadvantaged Communities, [oehha.ca.gov](https://oehha.ca.gov)

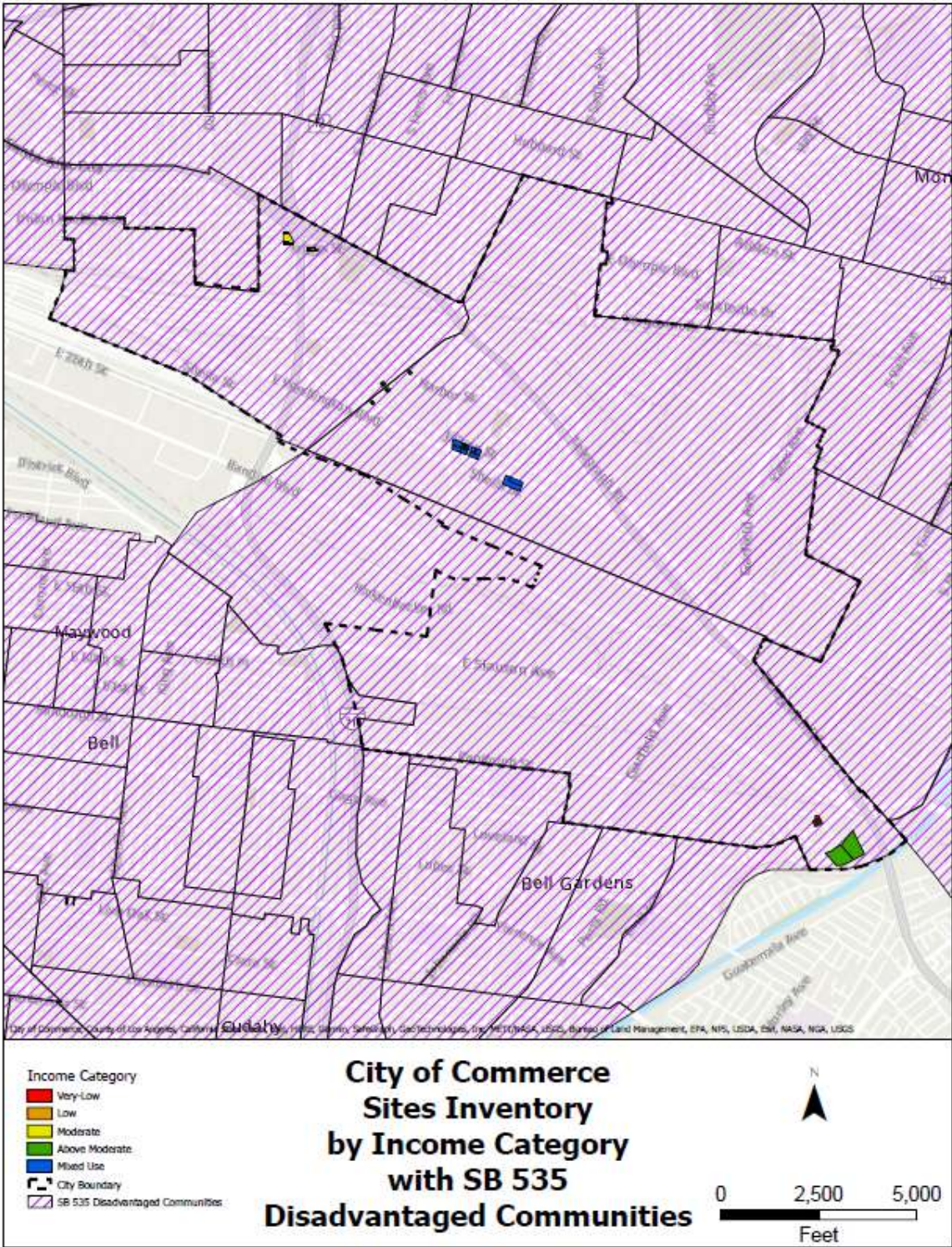
Figure C-2: Sites Inventory With CalEnviroScreen



Source: HCD Data Viewer



Figure C-3: Disadvantaged Communities Designation (CalEPA)



Source: HCD Data Viewer

## Detailed Sites Inventory

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone ?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
<b>City Owned Vacant Sites in Residential Zones</b>															
1338 S Eastern Ave	5241-013-904	0.11	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
1368 S Eastern Ave	5241-013-906	0.12	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
1350 S Eastern Ave	5241-013-908	1.08	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	13	0	0	13	0
1362 S Eastern Ave	5241-013-905	0.12	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
4519 Triggs Street	5241-013-907	0.12	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
<b>Site A</b>		<b>1.55</b>									<b>17</b>	<b>0</b>	<b>0</b>	<b>17</b>	<b>0</b>
7169 Gage Ave	6357-016-908	0.41	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	4	4	0	0	0
Gage Ave/Zindell Ave	6357-016-906	0.18	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	2	2	0	0	0
7165 Gage Ave	6357-016-909	0.15	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	3	0	3	0	0
7155 Gage Ave	6357-016-907	0.16	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	3	0	3	0	0
<b>Site B</b>		<b>0.9</b>									<b>12</b>	<b>6</b>	<b>6</b>	<b>0</b>	<b>0</b>
<b>Subtotal (A+B)</b>		<b>2.45</b>									<b>29</b>	<b>6</b>	<b>6</b>	<b>17</b>	<b>0</b>
<b>Non-City-Owned Vacant Opportunity Sites in Residential Zones</b>															
Duncan Ave/Triggs Street	5244-002-032	0.08	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	0	1
Duncan Ave/Triggs Street	5244-002-031	0.08	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	0	1
Duncan Ave/Triggs Street	5244-002-033	0.22	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	2	0	0	0	2
1411 S. McBride Ave	5244-002-034	0.07	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	0	1
<b>Subtotal Site C</b>		<b>0.45</b>									<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>



2021-2029 Housing Element

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone ?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
<b>Approved Modelo Specific Plan</b>					-										
Zindell Ave/Gage Ave	6357-018-900	5.07	Yes - Site D	Public facilities	PF	PF	Yes	Modelo SP	*based on # of units approved in SP	87	425				425
Zindell Ave/Gage Ave	6357-019-904	4.65	Yes - Site D	Public facilities	LDR	PF	Yes	Modelo SP		87	425				425
<b>Subtotal Site D</b>		<b>9.72</b>										<b>850</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>City-Owned Underutilized Sites in Proposed Mixed Use Areas</b>															
5736 Washington Blvd	6334-006-900	0.89	Yes - Site E	Commercial - Veolia Transportation	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	44	11	11	11	11
5733 Sheila St	6334-006-901	1.72	Yes - Site E	Commercial - Veolia Transportation	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	86	21	22	22	21
<b>Site E</b>		<b>2.61</b>									<b>130</b>	<b>32</b>	<b>33</b>	<b>33</b>	<b>32</b>
5611 Washington Blvd	6335-023-900	0.59	Yes - Site F	City Corp Yard	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	29	7	7	7	8
5600 Jillson St	6335-023-901	0.3	Yes - Site F	City Corp Yard - parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	15	4	4	4	3
Jillson St/Daniel Ave	6335-023-902	0.07	Yes - Site F	City Corp Yard - parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	0	1	1	1
Jillson St/Daniel Ave	6335-023-903	0.36	Yes - Site F	City Corp Yard - parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	18	4	4	5	5
<b>Site F</b>		<b>1.32</b>									<b>65</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>17</b>
2500 Eastern Ave	6335-024-900	0.69	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	34	8	8	9	9
Jillson St/Daniel Ave	6335-024-901	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-902	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-903	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-904	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-905	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1

2021-2029 Housing Element

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone ?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
Jillson St/Daniel Ave	6335-024-906	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-907	0.15	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	7	1	2	2	2
Washington Blvd/Daniel Ave	6335-024-908	0.41	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	20	5	5	5	5
5555 Washington Blvd	6335-024-909	0.53	Yes - Site G	Commercial: Jack-in-the-Box	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	26	6	6	7	7
<b>Site G</b>		<b>2.2</b>									<b>105</b>	<b>26</b>	<b>21</b>	<b>29</b>	<b>29</b>
<b>Subtotal (E through G)</b>		<b>6.13</b>									<b>300</b>	<b>73</b>	<b>70</b>	<b>79</b>	<b>78</b>
<b>Non-City-Owned Underutilized Opportunity Sites In Proposed Mixed Use Areas</b>															
Atlantic Blvd/Jardine St	5244-024-001	0.13	Yes - Site H	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	6	0	0	0	6
Atlantic Blvd/Jardine St	5244-024-002	0.05	Yes - Site H	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Atlantic Blvd/Jardine St	5244-024-003	0.05	Yes - Site H	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
<b>Site H</b>		<b>0.23</b>									<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>
Atlantic Blvd/Jardine St	6335-005-053	0.05	Yes - Site I	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Atlantic Blvd/Jardine St	6335-005-054	0.06	Yes - Site I	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Atlantic Blvd/Jardine St	6335-005-055	0.12	Yes - Site I	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	6	0	0	0	6
<b>Site I</b>		<b>0.23</b>									<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>
2358 Atlantic Blvd	6335-005-056	0.05	Yes - Site J	Parking lot	Atlantic MU	C/M1	Yes	MU Washington 1	40-85 du.ac	50	2	0	0	0	2
2354 Atlantic Blvd	6335-005-057	0.11	Yes - Site J	Parking lot	Atlantic MU	C/M1	Yes	MU Washington 1	40-85 du.ac	50	5	0	0	0	5
<b>Site J</b>		<b>0.16</b>									<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>
Atlantic Blvd/Harbor Blvd	6335-003-002	0.05	Yes - Site K	Vacant	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
2210 Atlantic Blvd	6335-003-003	0.11	Yes - Site K	Office for Water Company ?	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	5	0	0	0	5
<b>Site K</b>		<b>0.16</b>									<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>

2021-2029 Housing Element

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone ?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
<i>Subtotal (H through K)</i>		0.78									34	0	0	0	34
<b>TOTAL</b>		19.53									1218	79	76	96	967



Site Photos of 2210 Atlantic Boulevard



# APPENDIX D: AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

## Introduction and Overview of AB 686

Assembly Bill 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. AB 686 mandates that local governments identify meaningful goals to address the impacts of systemic issues such as residential segregation, housing cost burden, and unequal educational or employment opportunities to the extent these issues create and/or perpetuate discrimination against protected classes. In addition, AB 686:

- Requires the state, cities, counties, and public housing authorities to administer their programs and activities related to housing and community development in a way that affirmatively furthers fair housing;
- Prohibits the state, cities, counties, and public housing authorities from taking actions materially inconsistent with their AFFH obligation;
- Requires that the AFFH obligation be interpreted consistent with HUD's 2015 regulation, regardless of federal action regarding the regulation;
- Adds an AFFH analysis to the Housing Element (an existing planning process that California cities and counties must complete) for plans that are due beginning in 2021;
- Includes in the Housing Element's AFFH analysis a required examination of issues such as segregation and resident displacement, as well as the required identification of fair housing goals.

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 County's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

## Analysis Requirements

An assessment of fair housing must consider the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. The analysis must address patterns at a regional and local level and trends in patterns over time. This analysis should compare the locality at a

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county level or even broader regional level such as a Council of Government, where appropriate, for the purposes of promoting more inclusive communities.

For the purposes of this AFFH, “Regional Trends” describes trends in Los Angeles County (County). “Local Trends” describe trends specific to the City of Commerce.

### **Sources of Information**

The analysis of fair housing issues in Commerce relies on the following sources:

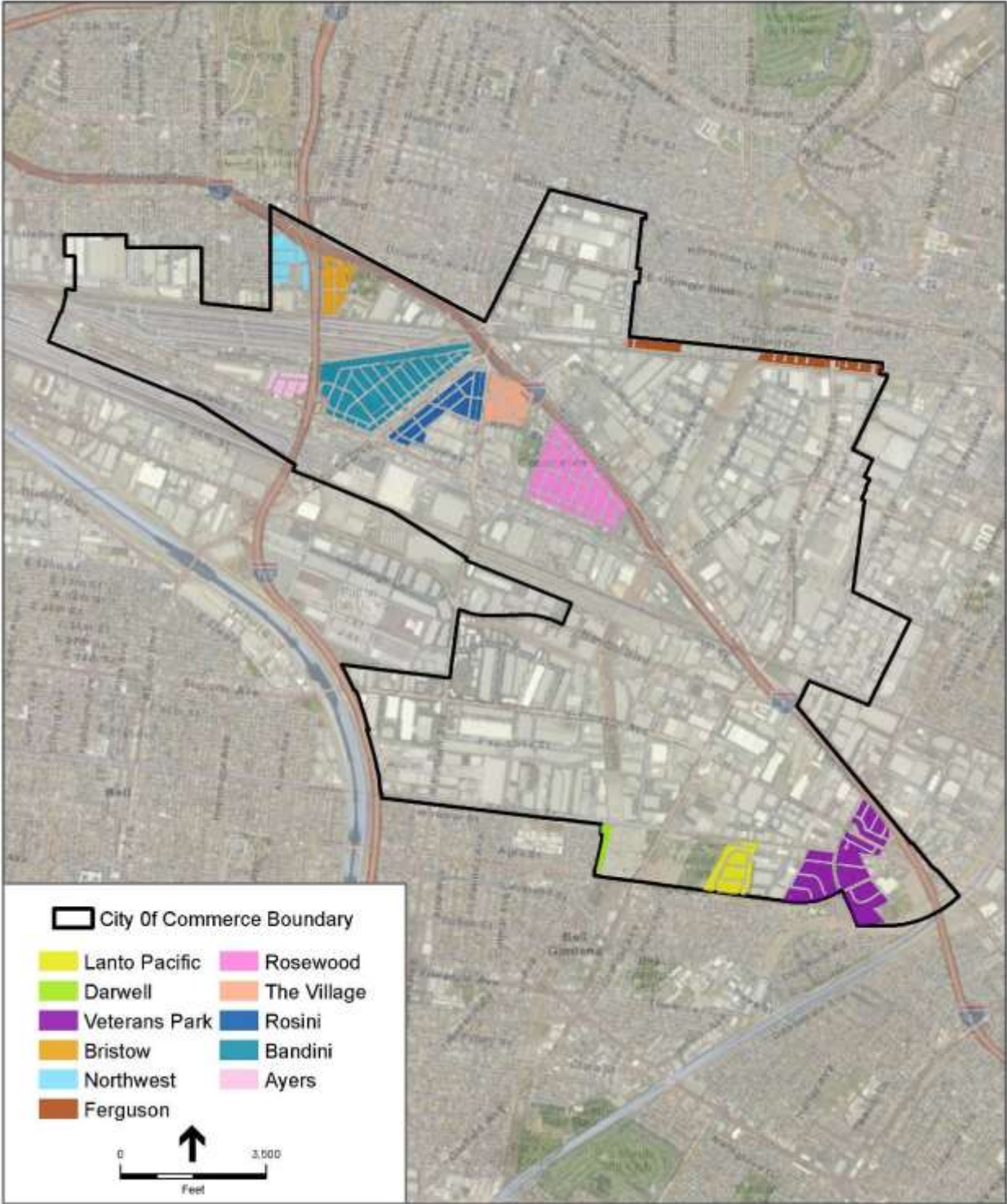
- California Department of Housing and Community Development (HCD) AFFH Data Viewer
- U.S. Census Bureau’s Decennial Census (referred to as “Census”) and 2016-2020 American Community Survey (ACS)
- U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data
- County of Los Angeles 2018 Analysis of Impediments to Fair Housing (2018 AI) prepared by the Los Angeles Community Development Authority (LACDA)
- Local knowledge

Some of these sources provide data on the same topic, but due to various methodologies, results may differ. For example, the decennial census and ACS report slightly different estimates for the total population, number of households, number of housing units, and household size. This is, in part, because ACS provides estimates based on a small survey of the population taken over the course of the whole year. Because of the survey size and seasonal population shifts, some information provided by the ACS is less reliable. For this reason, the readers should keep in mind the potential for data errors when drawing conclusions based on the ACS data used in this chapter. The information is included because it provides an indication of possible trends. As such, even though more recent ACS data may be available, 2016-2020 ACS reports (and 2015-2019 for CHAS data) are cited more frequently.

### **Local Knowledge**

In addition to using federal or state level data sources, local jurisdictions are also expected to use local data and knowledge to analyze local fair housing issues. For purposes of this AFFH, various neighborhoods within the City of Commerce may be identified in the analysis. These neighborhoods are shown on Figure D-1.

Figure D-1: Commerce Residential Neighborhoods



Source: City of Commerce

## Assessment of Fair Housing Issues

### 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 of 1990 (ADA)** – covers public accommodations in both businesses and in multi-family housing developments
- **Rehabilitation Act of 1973** – expanded federal programs and services for persons with disabilities.
- **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 areas 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.
- **Government Code Section 65008** - prohibits a local government from using public or private land practices, decisions or authorizations to discriminate against low or moderate-income families or individuals.
- **Government Code Section 8899.50** - defines and requires public agencies to affirmatively further fair housing.
- **Government Code Section 11135** – no person shall be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination



under, any program or activity that is conducted by the state or funded/receives financial assistance from the state.

The City complies with applicable federal and state fair housing laws to ensure that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status, or sex.

### ***Regional Trend***

During the 2018 AI development process, LACDA implemented a series of outreach efforts including: regional discussion groups; four focus groups which met three times each, aimed to address disability and access, education, employment and transportation, and healthy neighborhoods; Resident Advisory Board Meetings; community input meetings; and the 2017 Resident Fair Housing Survey. Regional discussions included developer groups, companies, organizations, and agencies, and government groups, including the City of Commerce. The following topics were covered in the Government Discussion Group meeting:

- Lack of jurisdictions that have R/ECAP areas
- Discussion of community meetings
- Discussion of surveys
- City of Los Angeles R/ECAP areas
- Social engineering in the past due to highway construction and designing of public housing in poor areas by private, federal, and local governments
- Setting realistic goals and outcomes
- Housing Rights Center (HRC) - protected classes different in state verses federal law
- Mortgages based on disparate impact-census areas
- Disparate impacts on women

R/ECAPs are discussed in Chapter 3, Racially or Ethnically Concentrated Areas of Poverty, of this Assessment of Fair Housing. Historical trends, zoning, and home loan trends are also discussed in Chapter 5, Disproportionate Housing Needs, of this Assessment of Fair Housing.

Focus group meetings for preparation of the 2018 AI focused on the following contributing factors:

- **Education** – Attendees discussed the location of proficient schools, inadequate funding for schools both public and charter, lack of information on the transfer process for parents, and child safety when walking to school. Attendees expressed concern about school of choice and funding for under-performing schools, promotion of educational opportunities to parents, and safety.
- **Transportation and Jobs** – Attendees discussed lack of available clothing for employment, lack of resources and services for working families, stigma of

- transgender employees, and the prevalence of low skill workers. They expressed concern about the lack reliable transportation, jobs located far from workers, and childcare expenses.
- **Healthy Neighborhoods** – This focus group discussed location and access to grocery stores, illegal dumping, poor access to quality healthcare, and general public safety concerns such as safe streets and homeless encampments. There were concerns related to industrial facilities in communities highly burdened by air pollution, proximity to air pollution, bike and pedestrian improvements, and greenhouse gas emission reduction strategies.
  - **Disability and Access** – The disability and access focus group discussed availability of accessible housing options, lack of knowledge of the ADA’s Right to Reasonable Accommodation, overlapping needs of people with multiple disabilities, and a long waitlist for accessible and affordable housing.

A total of 6,290 responses were recorded from the 2017 Resident Fair Housing Survey. The survey found that most residents thought their neighborhood had adequate access to public transportation, cleanliness, and schools, and that the condition of public spaces and buildings were good, very good, or excellent. More residents reported availability of quality public housing and job opportunities were only fair or poor. The survey also found that households with a person with a disability found it more difficult to get around their neighborhood or apartment complex. Access to opportunities, housing conditions, and populations of persons with disabilities in Commerce are further discussed below in this Assessment of Fair Housing Issues.

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. Figure D-2 shows the number of FHEO inquiries throughout the County. Signal Hill has the highest concentration of inquiries (more than one inquiry per 1,000 people). Other areas with high concentrations of inquiries (one inquiry per 1,000 people) are located in Santa Monica, West Hollywood, Culver City, Irwindale and Lomita.

Founded in 1968, the Housing Rights Center (HRC) is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing.<sup>1</sup> HRC serves cities throughout Los Angeles County, including Commerce.

### **Local Trend**

According to the HCD AFFH Data Viewer, there has been only two FHEO inquiries in Commerce since 2013. Both were unrelated to a specific basis of discrimination and one was found to have no valid issue. There is no additional discrimination complaint or case

<sup>1</sup> Housing Rights Center, [www.housingrightscenter.org](http://www.housingrightscenter.org)



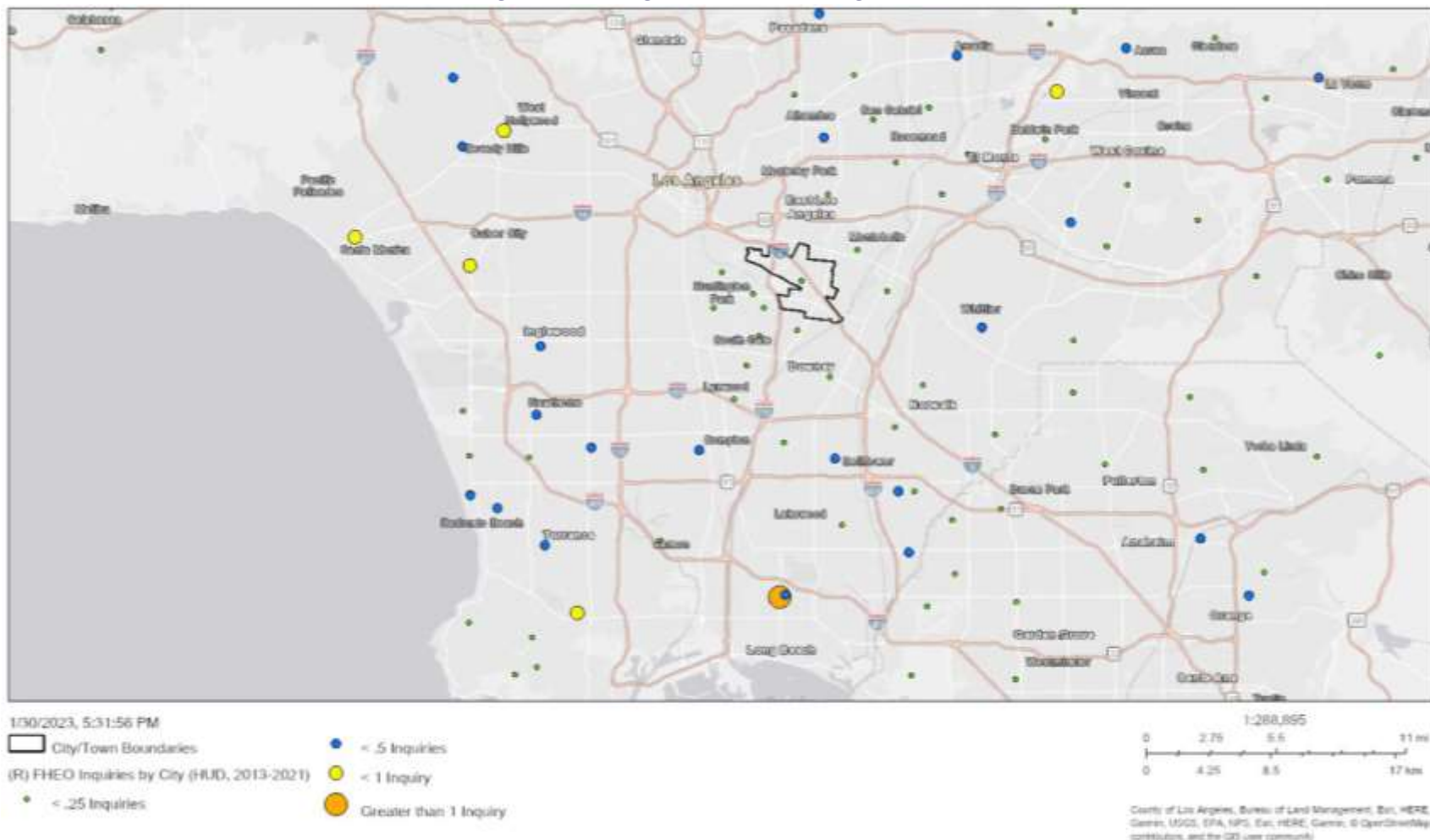
data available for the City of Commerce. Residents have contacted the City regarding rent control and fair housing services. Information about the HRC and other resources has been provided.

The Draft Housing Element was available for public review from May 25, 2023 through June 26, 2023. The City also held a public workshop on May 31, 2023. The stakeholder list (available in Appendix A, includes a variety of organizations that work on fair housing issues, including legal advisory groups and affordable housing developers. The following fair housing related issues were discussed at the public workshop:

- The City needs to target affordable housing
- The City effort for mixed use should result in affordable housing development; affordable development has first offer
- Increase senior housing
- The City needs to encourage and make it easier for home owners to convert existing square footage for ADU use to provide housing for low income residents

The General Plan Update process will be continuing into Summer 2024. Draft Elements will be available in March. Outreach will be made to the stakeholder list included in Appendix A of this element, many whom support fair housing goals. The General Plan will be reviewed with the City Council subcommittees, Planning Commission and City Council. Community meetings and adoption hearings will occur in Summer 2024.

Figure D-2: Regional Fair Housing Inquiries



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 (2018), 2022.

## Integration and Segregation

### Race and Ethnicity

The 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 includes racial/ethnic minority population trends, maps of minority concentrated areas over time, and an analysis of the City's sites inventory.

#### Regional Trend

As shown in Table D-1 racial/ethnic minority groups make up 74 percent of the Los Angeles County population. Nearly half of the Los Angeles County population is Hispanic/Latino (48 percent), 26 percent of the population is White, 15 percent is Asian, and eight percent is Black/African American. Commerce and the neighboring cities are primarily Hispanic or Latino. Downey's percentage of Hispanic or Latino residents is 74 percent, while 98 percent of Maywood residents are Hispanic or Latino. White residents make up the next largest percentage of residents in the County, Commerce and neighboring cities with the exception of Montebello, where Asian residents comprise the second largest percentage in the city.

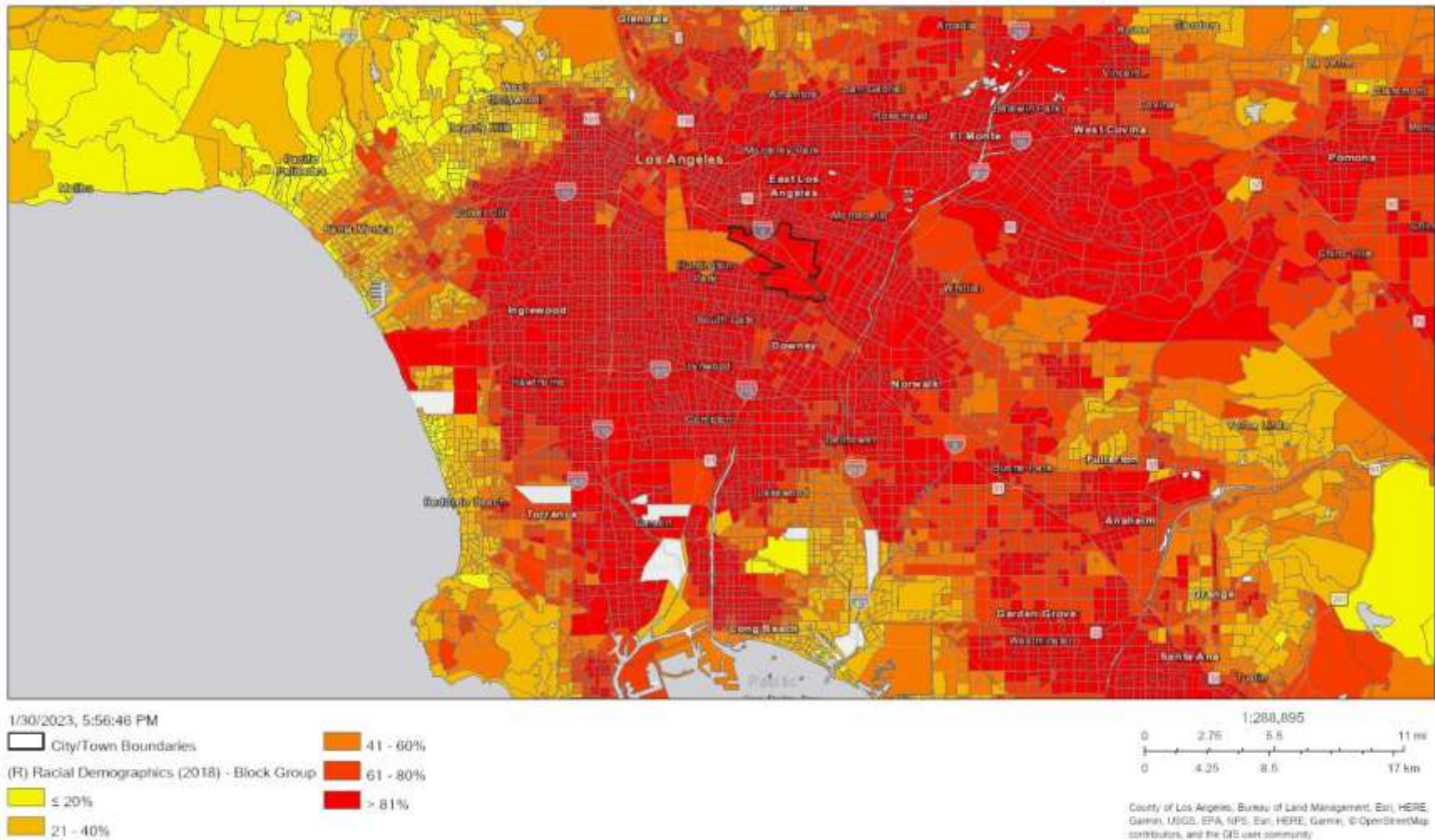
**Table D-1: Racial/Ethnic Composition – LA County, Commerce and Surrounding Cities**

	Bell	Bell Gardens	Commerce	Downey	Maywood	Montebello	Pico Rivera	LA County
Hispanic or Latino	89.7%	96.2%	95.2%	74.2%	97.6%	79%	90.5%	48.3%
White	5.6%	2%	2.3%	14%	0.9%	6.6%	4.8%	25.9%
Black/African American	3%	1%	0.7%	3.1%	0.3%	0.6%	0.8%	7.8%
American Indian and Alaska Native	0.2%	0.1%	0.7%	0.1%	---	0.1%	0.1%	0.2%
Asian	0.8%	0.4%	0.9%	6.9%	0.5%	13%	3.5%	14.6%
Native Hawaiian and Other Pacific Islander	0.2%	---	0.0%	0.2%	---	---	0.1%	0.2%
Some other race	0.1%	---	0.1%	0.2%	0.8%	0.1%	0.1%	0.4%
Two or more races	0.3%	0.2%	0.1%	1.3%	---	0.5%	0.2%	2.6%

Source: 2016-2020 ACS, Table DP05

Figure D-3 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, 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. Commerce's racial/ethnic minority populations are comparable to surrounding jurisdictions.

**Figure D-3: Regional Racial/Ethnic Minority Concentrations by Block Group (2018)**



Source: HCD AFFH Data Viewer (2018), 2022.

### Local Trend

According to the 2016-2020 ACS, Commerce's population in 2020 was 95 percent Hispanic or Latino and two percent White. All other races and ethnicities are less than one percent of the total population. Since 2010, the Hispanic or Latino population increased by about four percent and the American Indian and Alaska Native population increased by about a half a percent. All other races and ethnicities either stayed the same or decreased in Commerce between 2010 and 2020.

**Table D-2: Change in Racial/Ethnic Composition (2010-2020)**

Race/Ethnicity	2010		2020		Los Angeles County
	Number	Percentage	Number	Percentage	
Hispanic or Latino <sup>1</sup>	11,644	91.3%	12,123	95.2%	48.3%
White	420	3.3%	298	2.3%	25.9%
Black/African American	249	2.0%	85	0.7%	7.8%
American Indian and Alaska Native	15	0.1%	93	0.7%	0.2%
Asian	231	1.8%	112	0.9%	14.6%
Native Hawaiian and Other Pacific Islander	41	0.3%	0	0.0%	0.2%
Some other race alone	0	0.0%	8	0.1%	0.4%
Two or more races	158	1.2%	19	0.1%	2.6%

Source: 2006-2010 and 2016-2020 ACS, Table DP05

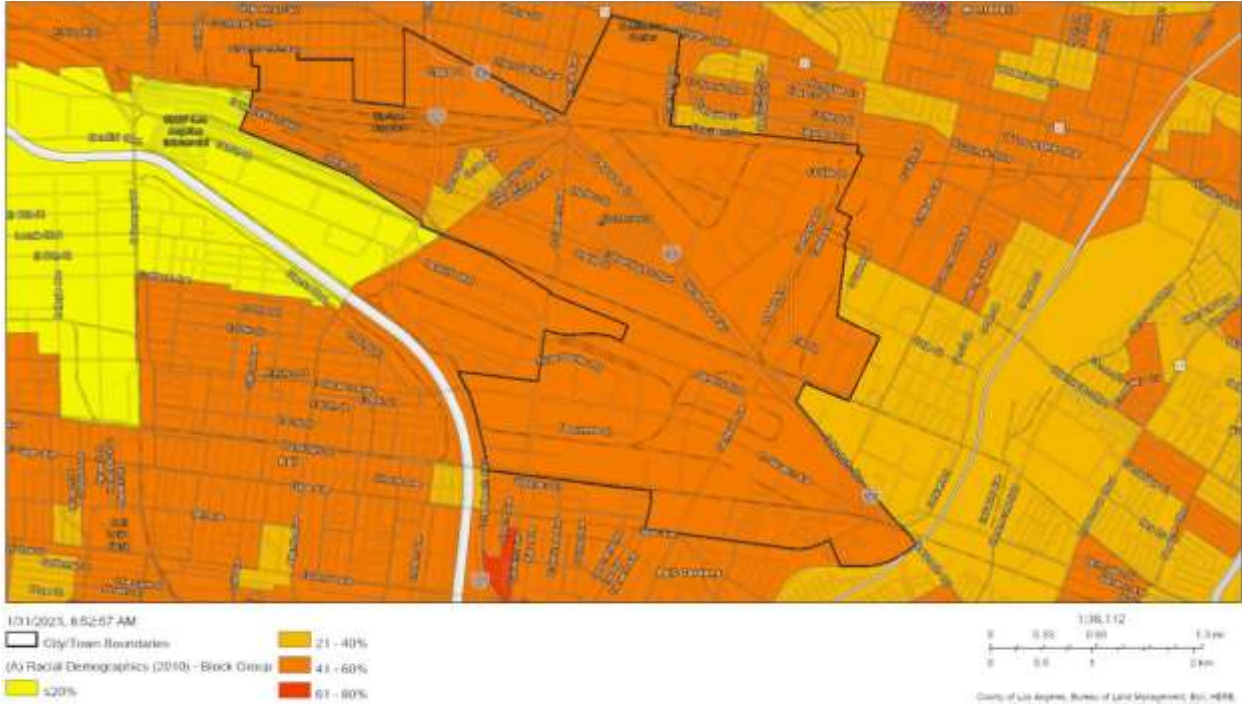
Figure D-4 and [Figure D-5](#) compare racial or ethnic minority concentrations in Commerce in 2010 and 2018. All areas of the City have seen an increase in minority populations since 2010 and Commerce is now more than 81 percent non-White.

### Distribution of RHNA Units by Percent Minority Concentration

As described above, the City of Commerce is 95 percent Hispanic and two percent White. All other races and ethnicities are less than one percent of the total population. The City's site inventory shown on [Figure D-5](#) includes units of all income categories and will provide housing opportunities for Commerce's Hispanic and other minority residents.



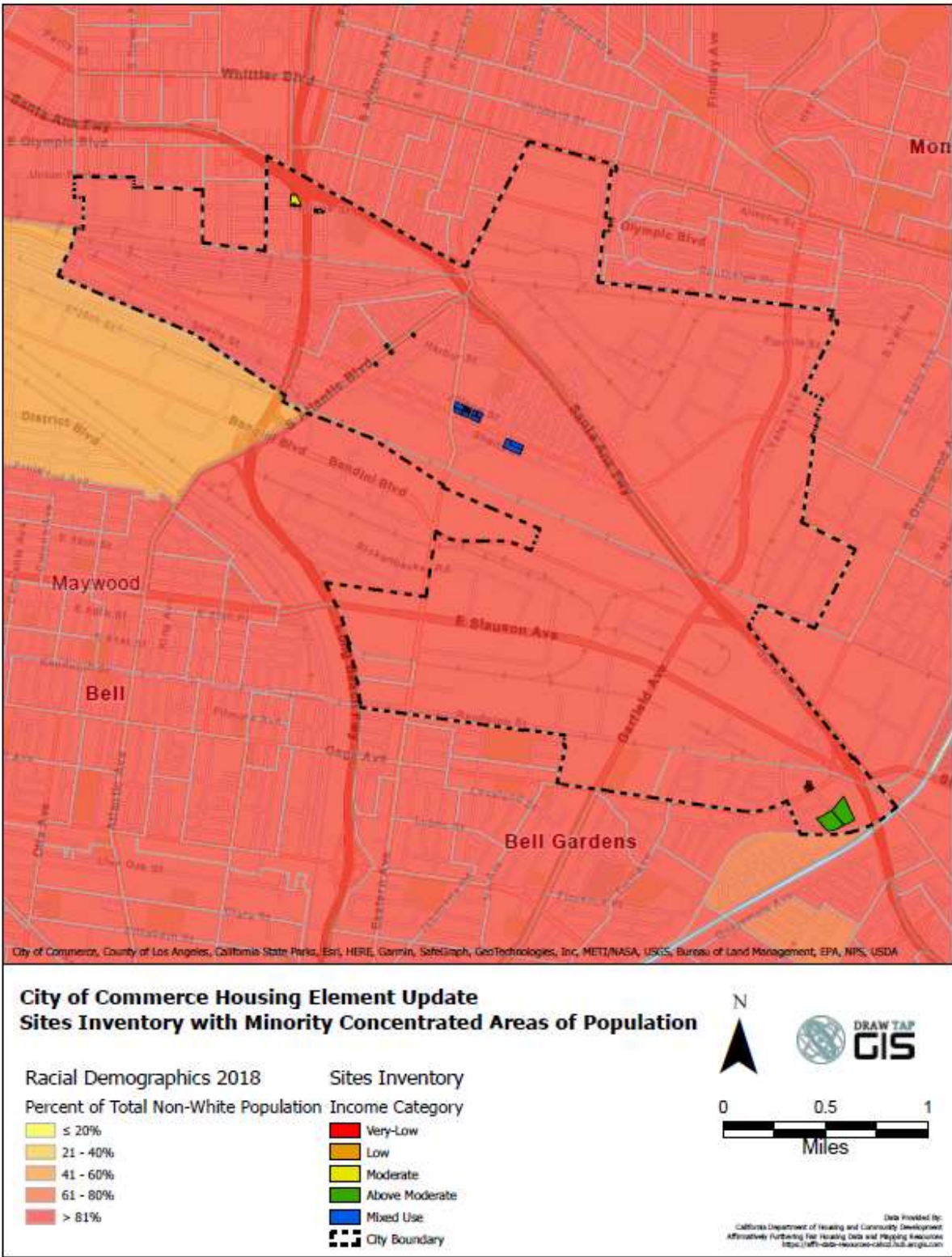
Figure D-4: Racial/Ethnic Minority Concentrations by Block Group (2010)



Source: HCD AFFH Data Viewer (2018), 2022.



**Figure D-5: Racial/Ethnic Minority Concentrations by Block Group and Sites Inventory (2018)**



Source: HCD AFFH Data Viewer (2018), 2022

## 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 2016-2020 ACS, 10 percent of Los Angeles County residents experience a disability. Commerce has a larger population that experiences a disability (13 percent). Commerce also has the highest number of disabled residents compared to the neighboring cities of Bell (9 percent), Bell Gardens (6 percent), Downey (9 percent), Maywood (7 percent), Montebello (13 percent) and Pico Rivera (9 percent).

As shown in ~~Figure D-6~~~~Figure D-6~~~~Figure D-6~~~~Figure D-6~~, less than 20 percent of the population in most tracts in Los Angeles County experience a disability. Tracts with disabled populations exceeding 20 percent are not concentrated in one area of the County. Tracts with populations of persons with disabilities exceeding 20 percent are near the cities of Inglewood, Los Angeles, Long Beach, Norwalk, and Santa Monica. The coastal cities of El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach tend to have smaller disabled populations.

### *Local Trend*

All tracts in Commerce have populations of persons with disabilities between 10 and 20 percent (Figure D-7). The concentration of persons with disabilities in Commerce is comparable or slightly greater to neighboring jurisdictions. Ambulatory difficulties, independent living and cognitive difficulties are the most common disability type in Commerce; seven percent of the population experiences an ambulatory difficulty, seven percent experiences an independent living difficulty, seven percent experiences a cognitive difficulty, four percent experiences a self-care difficulty, three percent experiences a vision difficulty, and two percent experiences a hearing difficulty.

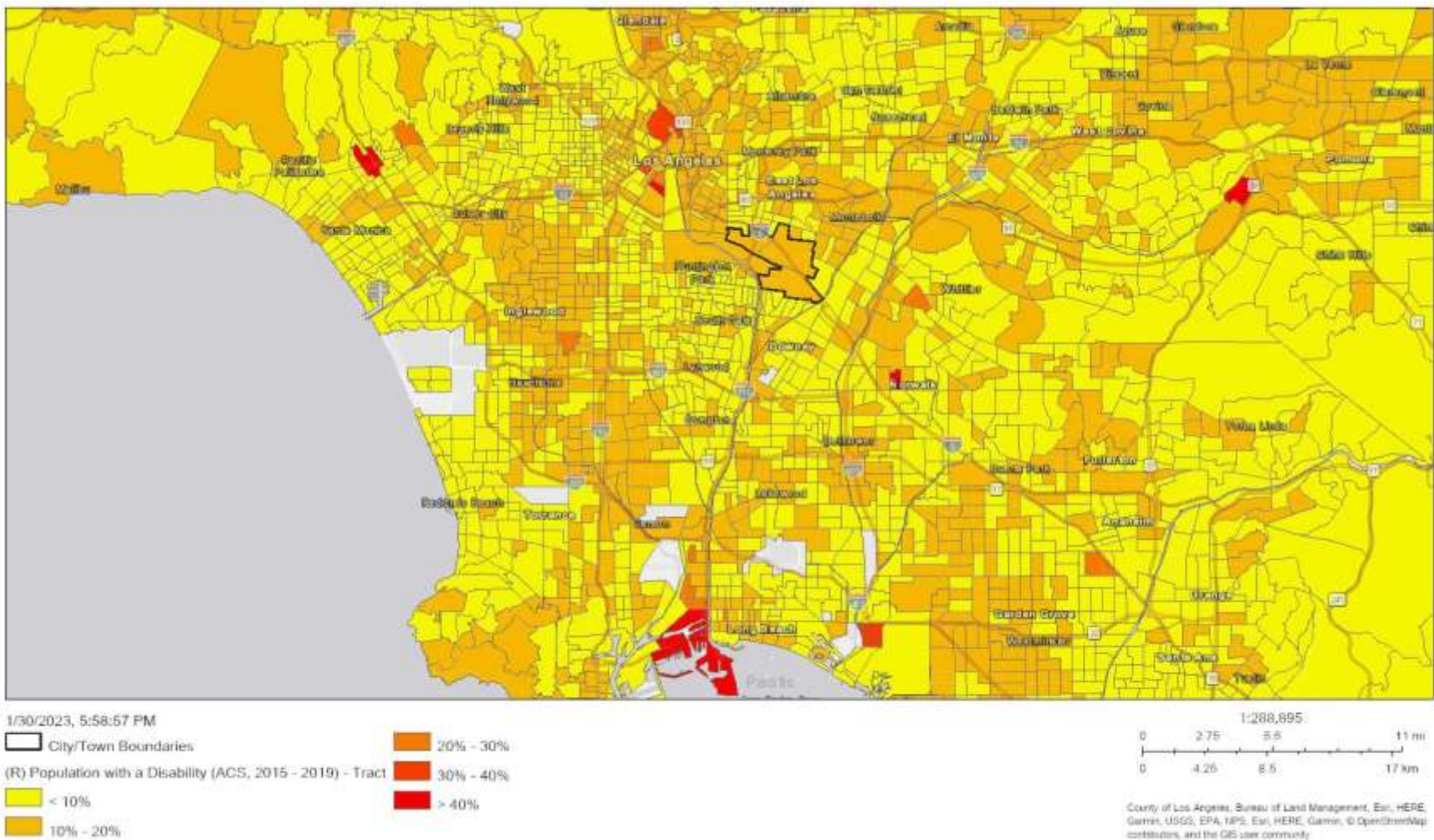
Disabilities are generally more common amongst aging populations. Approximately 30 percent of seniors in Commerce, age 65 or older, have a disability. Approximately 18 percent of the population citywide is aged 65 or older.

### *Distribution of RHNA Units by Percent Population with Disabilities*

All sites selected to meet the 2021-2029 RHNA are in tracts where 10 to 20 percent of the population experiences one or more disabilities (Figure D-7). The City's RHNA strategy does not concentrate RHNA units of any income level in areas where populations of persons with disabilities are more prevalent.

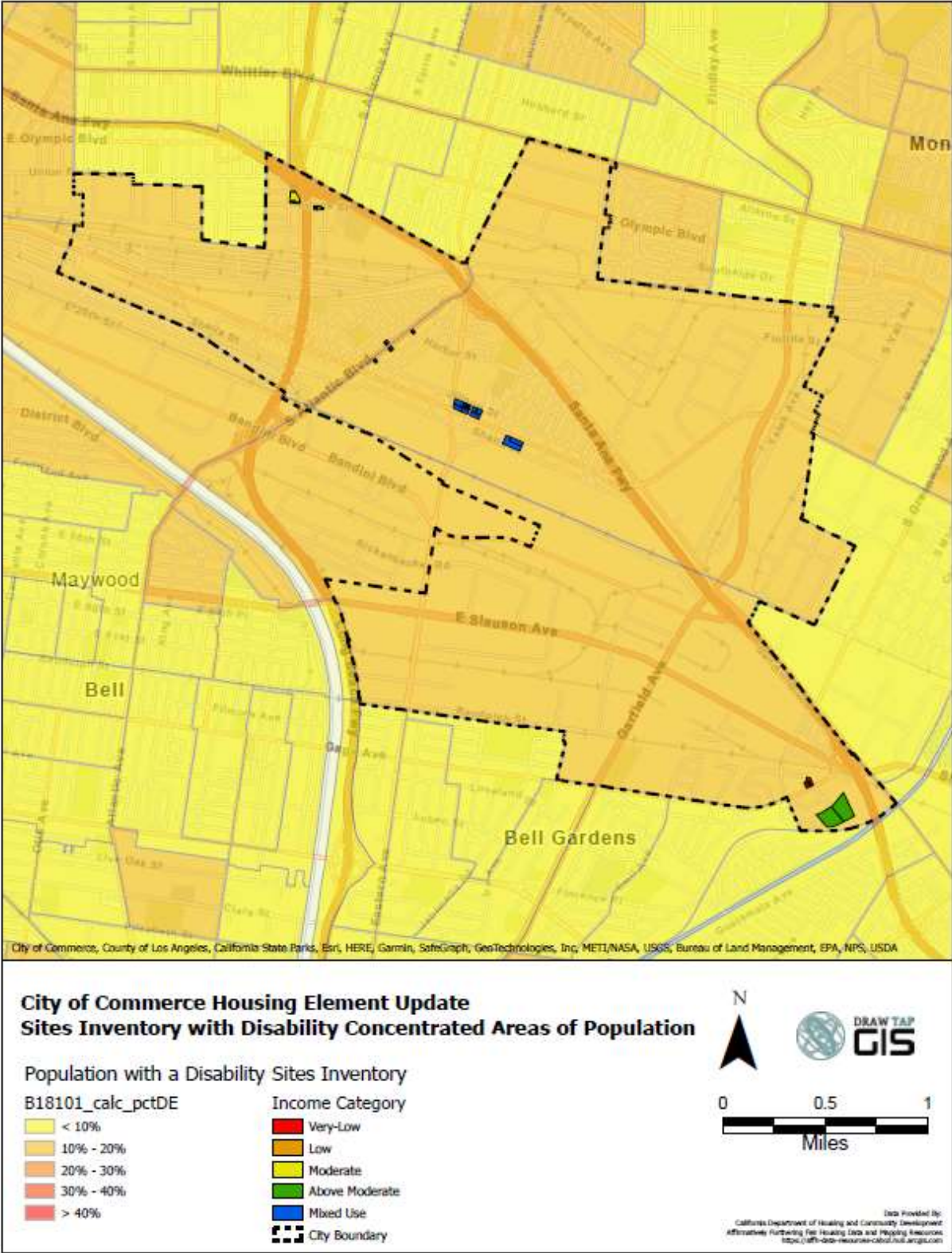


Figure D-6: Regional Concentrations of Persons with Disabilities by Tract



Source: HCD AFFH Data Viewer (2018), 2022

Figure D-7: Concentration of Persons with Disabilities by Tract and Sites Inventory



Source: HCD AFFH Data Viewer (2018), 2022



## Family Status

Familial status refers to the presence of children under the age of 18, regardless of whether the child is biologically related to the head of household, and the marital status of the head of household. 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.

### Regional Trend

According to the 2016-2020 ACS, 28 percent of households in Los Angeles County have children under the age of 18 (Table D-3). When looking at Commerce and neighboring cities, all have a greater percentage than the County as a whole. Bell Gardens and Maywood have the highest percentage (46 percent and 45 percent, respectively) while Pico Rivera and Montebello have the lowest (29 percent and 30 percent, respectively). For married couple households with children, Bell Gardens and Maywood have the highest percentage (55 percent and 51 percent, respectively) while Montebello and Commerce have the lowest (38 percent and 41 percent, respectively). Approximately 42 percent of married households, 37 percent of single male-headed households and 42 percent of single female headed households in the County have children. In the area in and around Commerce, Downey has the highest percentage (55 percent) of single male-headed households while Maywood has the highest percentage (57 percent) of single female-headed households. Pico Rivera has the lowest percentage of both single male- and single female-headed households (22 percent and 30 percent, respectively).

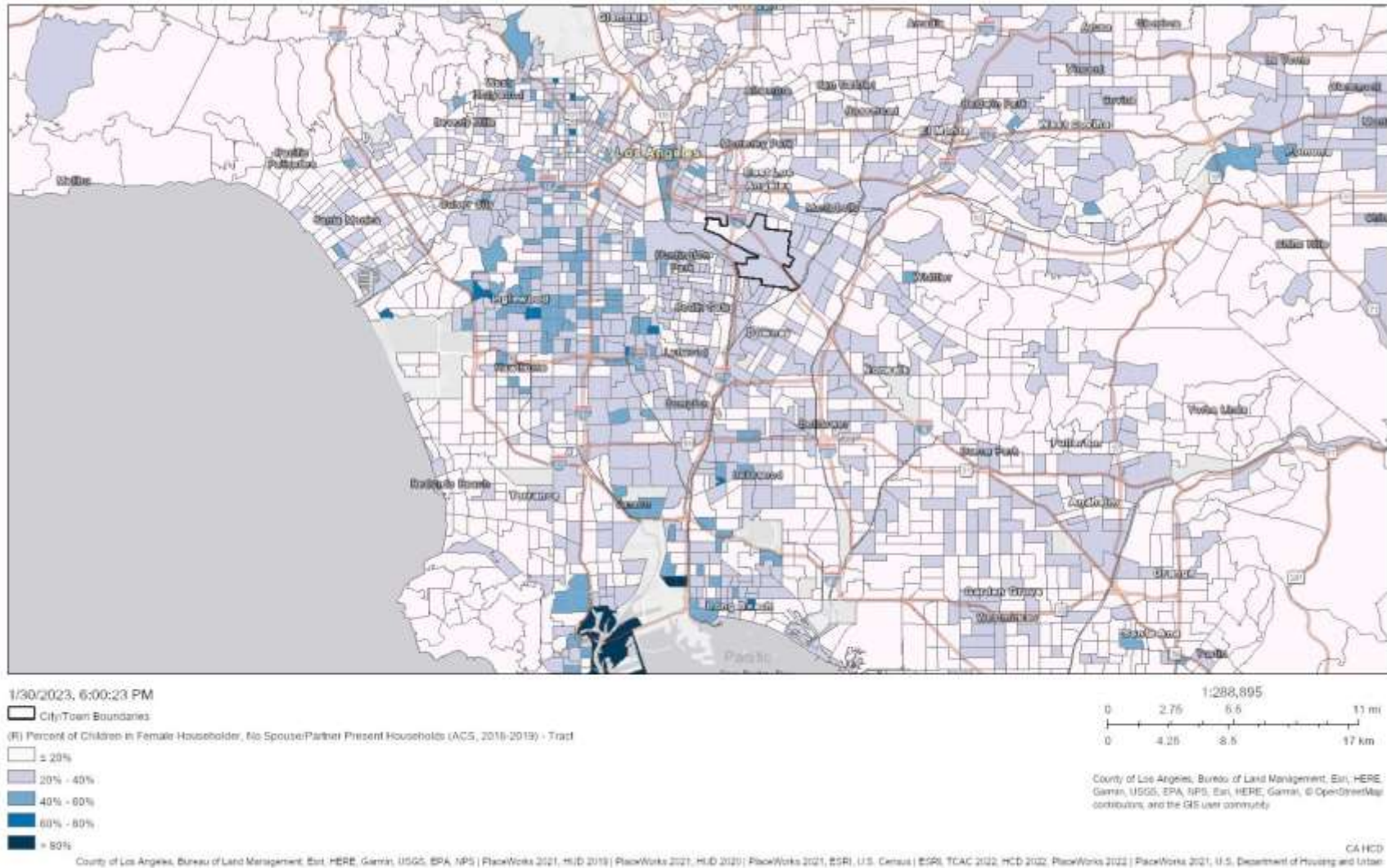
Figure D-8 shows the percent of children living in single-parent female-headed households by tract in LA County. Children in female-headed households are most concentrated in Inglewood, the City of Los Angeles, unincorporated Los Angeles County communities, and areas within Long Beach and Lakewood. In general, there are more children living in female-headed households in the central Los Angeles County areas, including Commerce and neighboring cities, compared to the South Bay, Westside, Gateway, San Fernando Valley, and San Gabriel Valley cities.

**Table D-3: Households with Children Under the Age of 18**

	Bell	Bell Gardens	Commerce	Downey	Maywood	Montebello	Pico Rivera	LA County
All Households	42.2%	46.4%	31.7%	36.8%	44.6%	30.5%	28.9%	27.6%
Married Couple Households	49.9%	55.4%	41.1%	43.8%	51.3%	38.3%	40.6%	42.0%
Single Male Households	39.9%	48.9%	32.6%	55.4%	50.9%	34.3%	22.2%	37.4%
Single Female Households	56.3%	53.5%	48.4%	47.3%	57.1%	42.7%	29.6%	42.3%

Source: 2016-2020 ACS, Table S1101

**Figure D-8: Regional Percent of Children in Female-Headed Households by Tract**



Source: HCD AFFH Data Viewer (2018), 2022

### Local Trend

According to 2020 ACS five-year estimates, about 32 percent of households have children under the age of 18 (Table D-3). The City's share of households with children is higher than the neighboring cities of Montebello (30 percent) and Pico Rivera (29 percent) and the County overall (28 percent) but lower than Bell (42 percent), Bell Gardens (46 percent), Downey (37 percent) and Maywood (45 percent).

Single parent households are also protected by fair housing law. As shown in Table D-3, 33 percent of single male-headed households and 48 percent of single female-headed households in Commerce have children. Figure D-9 shows that the tract in the northwestern part of Commerce (includes the Northwest, Bristow, Ayers and Bandini neighborhoods west of Atlantic Boulevard) has less than 20 percent of children living in single female-headed households. The remaining tracts in the City have 20 percent to 40 percent of children living in single female-headed households.

### Distribution of RHNA Units by Familial Status

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units counted toward meeting the RHNA is the development of the approved Modelo Specific Plan. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175 percent of AMI).

[Table D-4](#) and Table D-5 show the unit distribution by percent of children living in married-couple and female-headed households. A higher percentage of moderate and above moderate income units are located in the tracts with fewer children in married-couple households (40 to 60 percent) and more female headed-households (20 to 40 percent). The City's RHNA strategy does not place a disproportionate amount of lower income units in areas with a greater percentage of female headed-households. Furthermore, the Modelo Specific Plan provides flexibility in unit sizes in order to facilitate the development of a range of unit sizes and to accommodate multigenerational living.

**Table D-4: RHNA Unit Distribution by Percent of Children Living in Married-Couple Households**

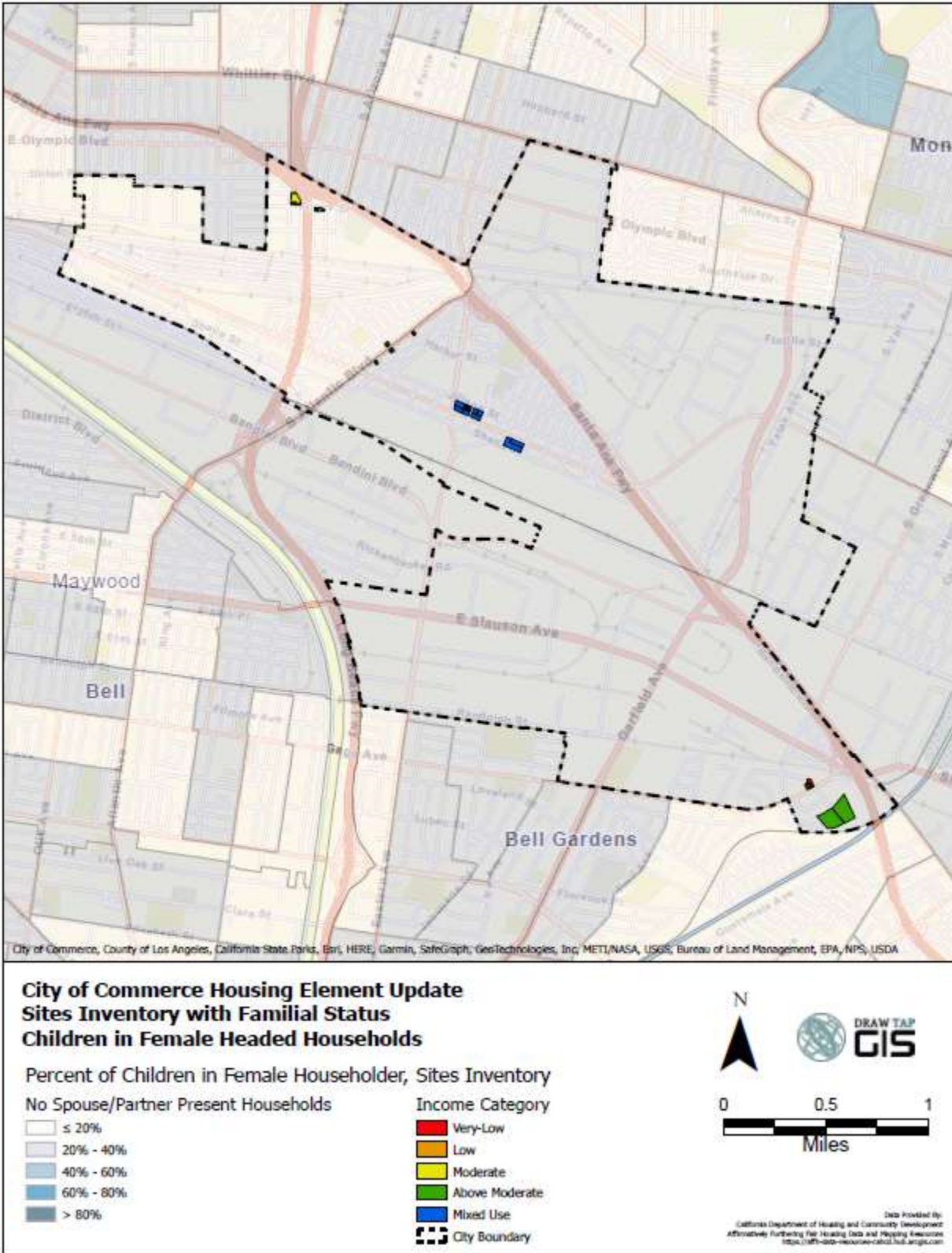
	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
40-60%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
60-80%	143	92.3%	96	100.0%	117	12.1%	356	29.2%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%



**Table D-5: RHNA Unit Distribution by Percent of Children Living in Female-Headed Households**

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
20-40%	155	100.0%	79	82.3%	952	98.4%	1,186	97.4%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

Figure D-9: Children in Single Female-Headed Households and Sites Inventory - Commerce



Source: HCD AFFH Data Viewer (2018), 2022

## Income

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. A stable income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population.

Households with lower incomes are limited in their ability to balance housing costs with other needs and often the ability to find housing of adequate size. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

For purposes of most housing and community development activities, HUD has established the four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions. [Table D-6](#) compares the HUD and State income categories. HUD defines a Low and Moderate Income (LMI) area as a census tract or block group where over 51 percent of the households earn extremely-low, low, or moderate incomes (<81 percent AMI). This means LMI areas (<81 percent AMI) as defined by HUD, are lower income areas (extremely low, very low, and low), as defined by HCD. These terms may be used interchangeably.

**Table D-6: Income Category Definitions**

HCD Definition		HUD Definition	
Extremely Low	0%-30% of AMI	Extremely Low	0%-30% of AMI
Very Low	31%-50% of AMI	Low	31%-50% of AMI
Low Income	51%-80% of AMI	Moderate	51%-80% of AMI
Moderate income	81-120% of AMI	Middle/Upper	> 81% of AMI
Above Moderate Income	>120% of AMI	--	--

*Note: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas and uses Los Angeles Metro Area for Los Angeles County.*

### Regional Trend

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation.

About 56 percent of County households are considered lower income (Table D-7). Commerce and almost all surrounding cities have a greater percentage of lower income households than the County, ranging from 62 percent in Pico Rivera to 87 percent in Bell Gardens. Downey has a similar percentage of lower income households (55 percent) as the County overall.

**Table D-7: Regional Income Distribution**

	Bell	Bell Gardens	Commerce	Downey	Maywood	Montebello	Pico Rivera	LA County
< 80% AMI	83%	87%	72%	55%	79%	66%	62%	56%
> 80%AMI	17%	13%	28%	45%	21%	34%	38%	44%
Total HH	8,970	9,825	3,535	33,045	6,695	18,890	16,850	3,316,795

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, based on 2015-2019 ACS

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers. Furthermore, because HUD programs do not cover households with incomes above 80 percent of the County Area Median Income (AMI), CHAS data does not provide any breakdown of income groups above 80 percent AMI.

Figure D-10 shows the median income for the County, Commerce and neighboring jurisdictions. Based on the 2020 ACS data, Commerce and almost all surrounding cities have a lower median income than the County overall (\$71,358). Downey is the only city with a higher median income (\$75,974).

**Figure D-10: Regional Median Income**



Source: 2016-2020 ACS, Table DP03

Figure D-11 shows LMI areas regionally. Coastal cities, from Rancho Palos Verdes to El Segundo, and the Pacific Palisades neighborhood have low concentrations of LMI households. In most tracts in these areas, less than 25 percent of the population is LMI. 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 cities of Glendale, El Monte, San Fernando, and Long Beach. Commerce has LMI household concentrations consistent with neighboring cities.

### Local Trend

Almost three-fourths (72 percent) of Commerce households are lower income (<80 percent AMI). As seen in Figure D-12, the highest concentrations (75 percent to 100 percent) of lower income households are located in the western area (encompassing the Northwest, Bristow, Ayers and western portion of the Bandini neighborhoods) and northern area (including the Ferguson neighborhood) of the city. The central area of Commerce (The Village and Rosewood residential neighborhoods) has the lowest percentage (49 percent) of LMI households.

As seen in Figure D-10, the median income in Commerce was \$54,639 in 2020. Figure D-13 shows that the block group with the highest median income (between \$55,000 and \$87,100) in Commerce is the same area with the lowest percentage of LMI households.

### Distribution of RHNA Units by Percent of Low and Moderate Income Population

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units counted toward meeting the RHNA are within the approved Modelo Specific Plan development. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175% percent of AMI).

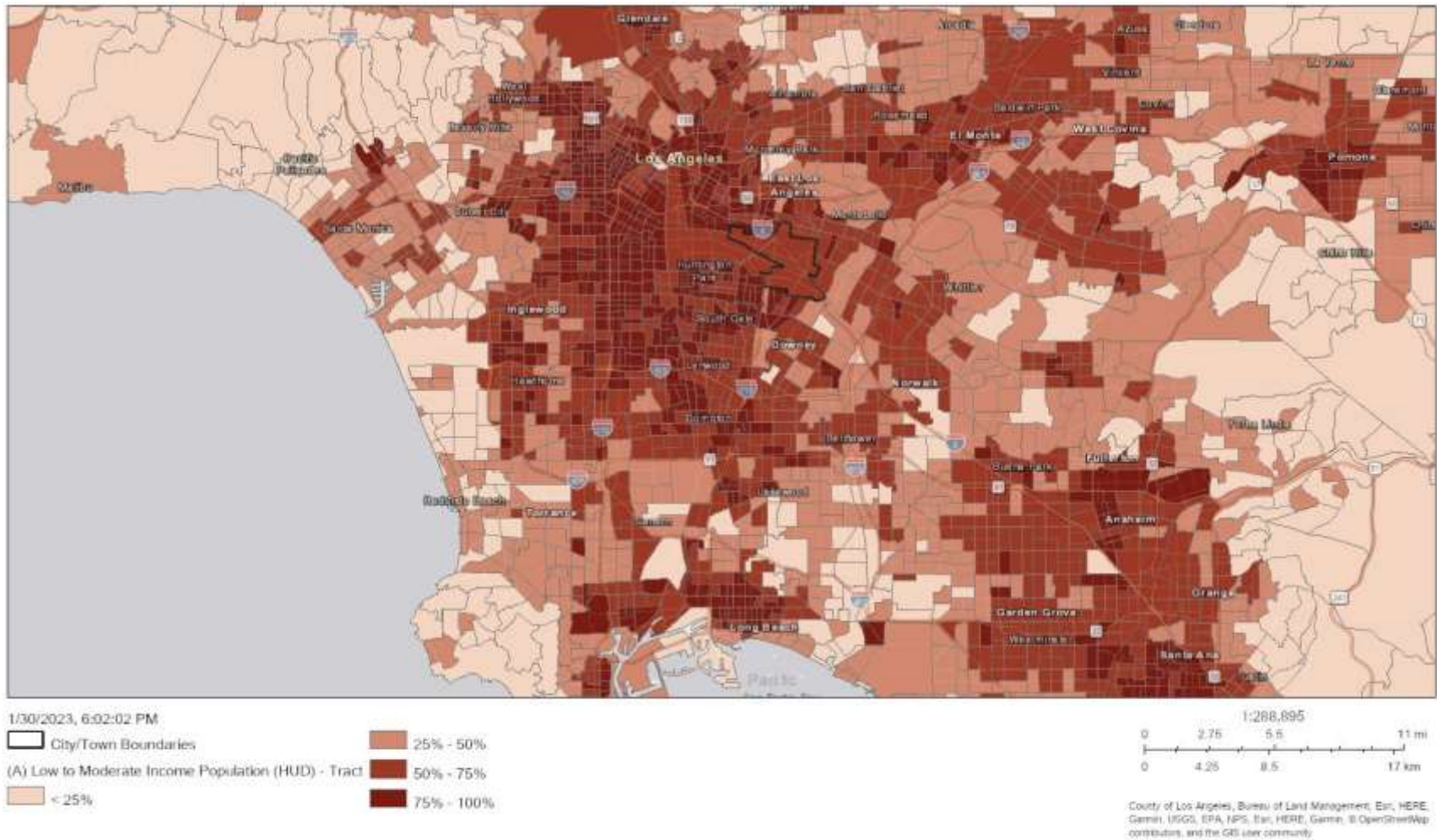
Table D-8 shows the unit distribution by percent LMI population. Most of the lower income units (92 percent) are placed in the central area of Commerce that has the lowest percentage (49 percent) of LMI households. These lower income units are also located in proposed mixed-use zones and will be part of mixed-income (low, moderate and above moderate) projects. The majority of above moderate income units (75 percent) are located in the areas of the City with a greater percentage of LMI households. This will provide for mobility options and a rebalancing of housing opportunities for the City's residents by introducing new housing types in the community.

**Table D-8: RHNA Distribution by LMI Population**

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
25-50%	143	92.3%	79	82.3%	78	8.1%	300	24.6%
50-75%	12	7.7%	0	0.0	884	91.4%	898	73.7%
75-100%	0	0.0%	17	17.7%	5	0.5%	22	1.8%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%



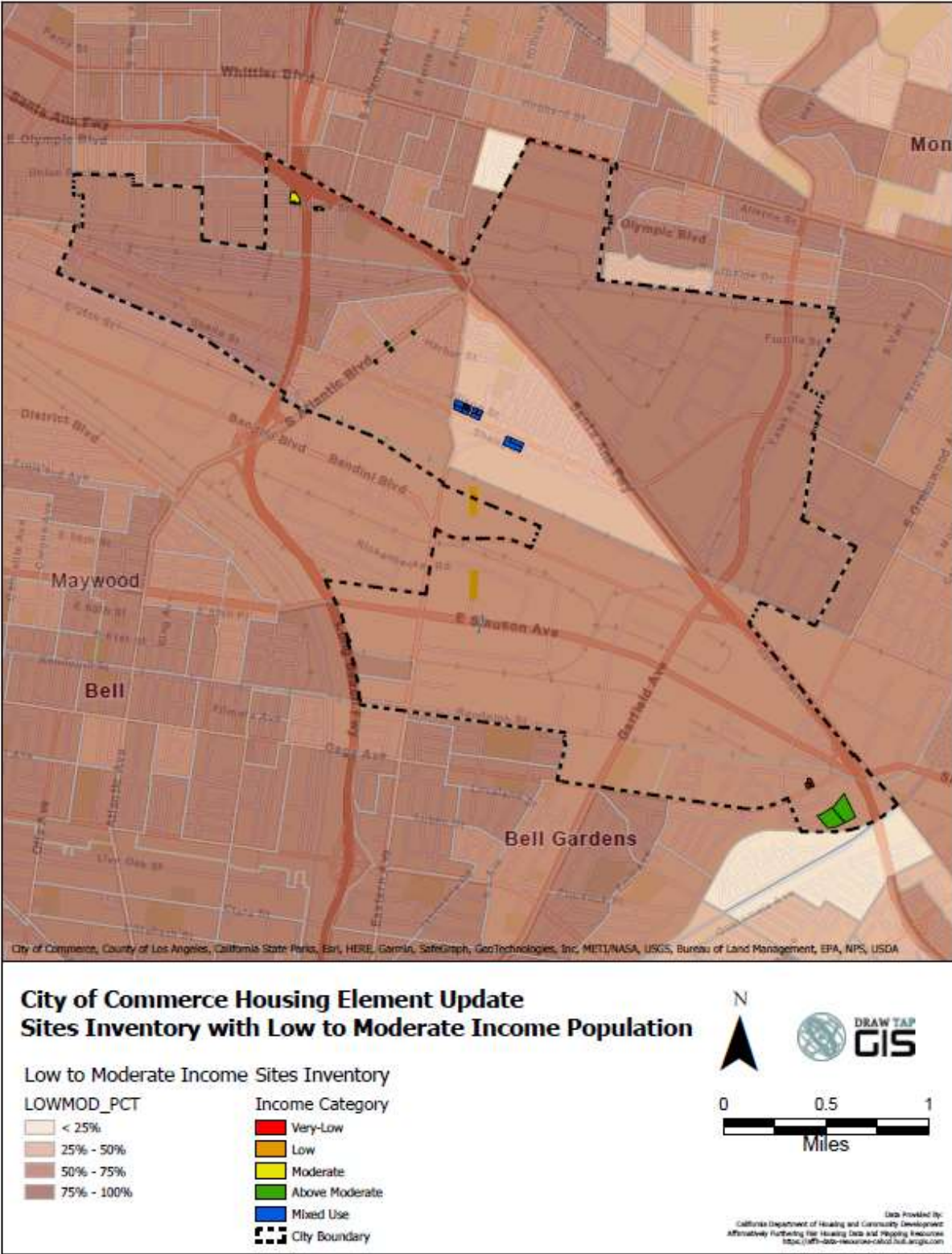
Figure D-11: Regional LMI Household Concentrations by Tract



CA HCD  
 County of Los Angeles, Bureau of Land Management; Esri, HERE, Garmin, USGS, EPA, NPS; Placemats 2021, HUD 2019, Placemats 2021, HUD 2020, Placemats 2021, Esri, U.S. Census | Esri, TCAC 2022, HCD 2022, Placemats 2022 | Placemats 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

Figure D-12: Commerce LMI Household Concentrations and Site Inventory by Block Group



Source: HCD AFFH Data Viewer (2018), 2022



Figure D-13: Commerce Median Income by Block Group



Source: HCD AFFH Data Viewer (2018), 2022

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## Housing Choice Vouchers and Public Housing

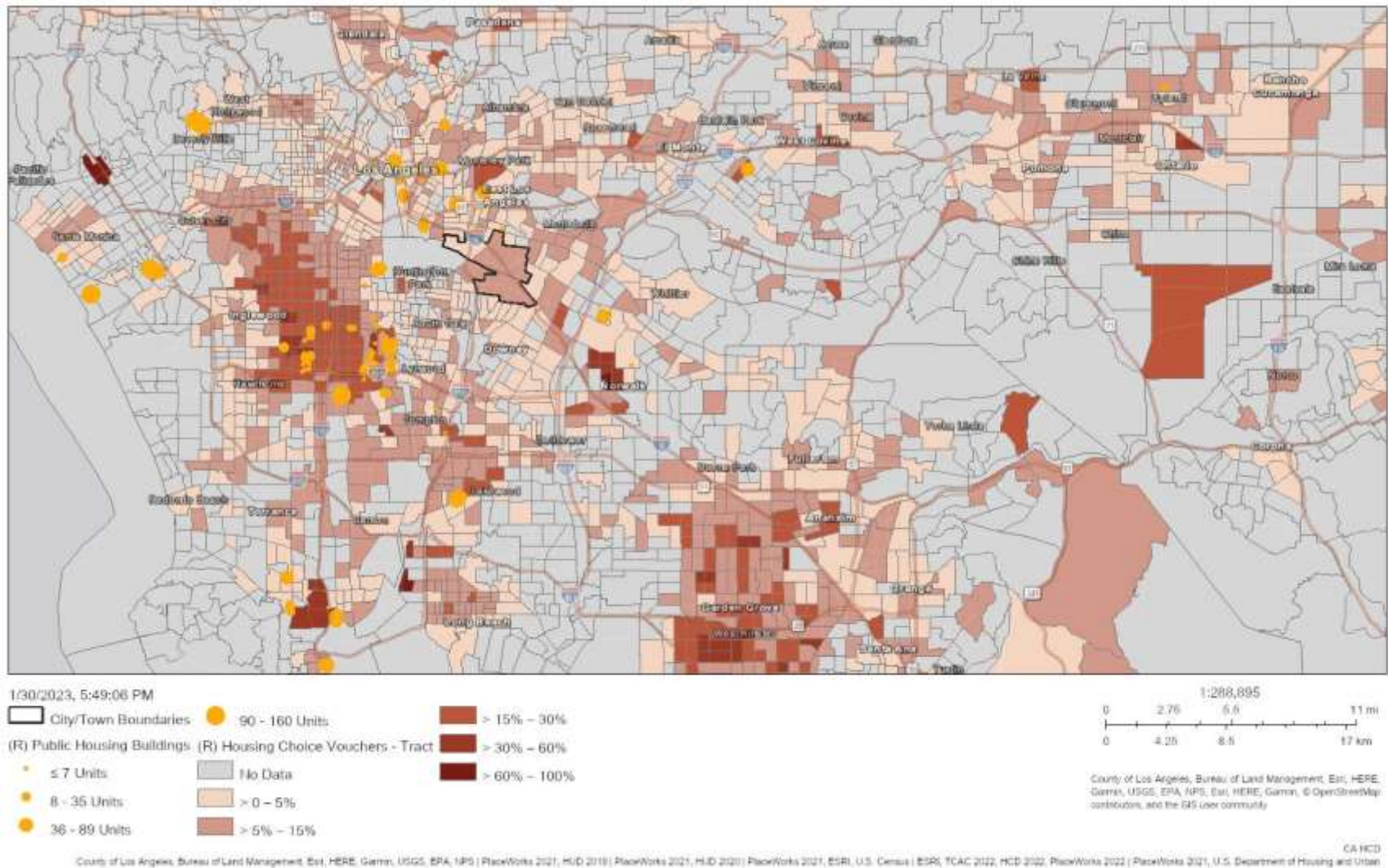
The Housing Choice Voucher Program (HCV) provides rental assistance to very low-income households who obtain housing in the private rental market. The HCV program's success depends upon the ability of participants to search for and find suitable housing in the private rental market. The program encourages participants to avoid high-poverty neighborhoods and encourages the recruitment of landlords with rental properties in lower-poverty neighborhoods. An analysis of the trends in HCV concentration can be useful in examining the success of the program in improving the living conditions and quality of life of its holders.

HCV programs are managed by Public Housing Agencies (PHAs), and the programs assessment structure (SEMAPS) includes an "expanding housing opportunities" indicator that shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration. A study prepared by HUD's Development Office of Policy Development and Research found a positive association between the HCV share of occupied-housing and neighborhood poverty concentration and a negative association between rent and neighborhood poverty. This means that HCV use was concentrated in areas of high poverty where rents tend to be lower. In areas where these patterns occur, the program has not succeeded in moving holders out of areas of poverty.

### *Regional Trend*

LACDA administers the HCV program in Los Angeles County. LACDA provides rental assistance to over 23,000 low-income families through the program. Figure D-14 shows housing choice voucher (HCV) recipients by tract as well as public housing buildings located in the County. As seen, HCVs are most concentrated in areas within the City of Los Angeles, the cities of Inglewood, Long Beach, Lakewood, and Norwalk, and several unincorporated County areas. Public housing buildings are concentrated in the same locations. However, there are many public housing buildings scattered throughout the County.

Figure D-14: Regional Housing Choice Vouchers and Public Housing Locations



Source: HCD AFFH Data Viewer (2018), 2022.



**Local Trend**

In Commerce, the highest concentrations of renters receiving housing choice vouchers (HCVs) are located east of Atlantic Boulevard (Figure D-15). In the tract west of Atlantic Boulevard approximately three percent of renters utilize HCVs. The tract east of Atlantic Boulevard and north of the railroad has approximately ten percent of renters with HCVs while the tract south of the railroad has approximately 11 percent. While there are a few public housing buildings adjacent to Commerce, none are located within the city limits.

**Figure D-15: Housing Choice Vouchers in Commerce**



Source: HCD AFFH Data Viewer (2018), 2022.

## Racially or Ethnically Concentrated Areas of Poverty

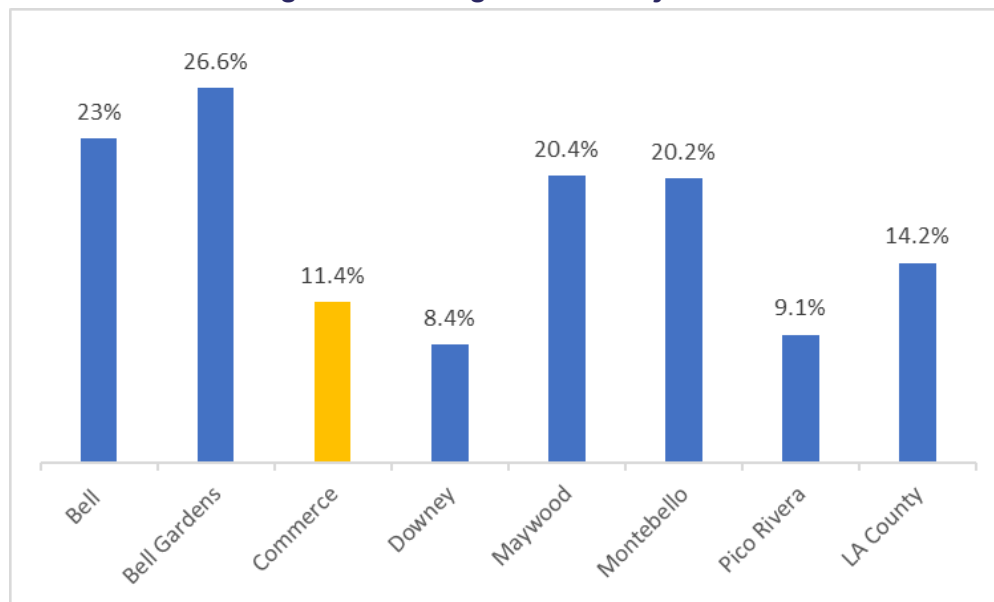
### Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

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 also identify areas of high segregation and poverty. TCAC Opportunity Maps are discussed in more detail in the following section of this fair housing assessment.

#### Regional Trend

Approximately 14 percent of the County population is below the federal poverty level (Figure D-16). For Commerce and the surrounding cities, Downey, Commerce and Pico Rivera all have lower percentages of residents living below the poverty level than the County overall. Bell, Bell Gardens, Maywood and Montebello have more residents living in poverty.

**Figure D-16: Regional Poverty Status**



Source: 2016-2020 ACS, Table DP03

Figure D-17 shows R/ECAPs, TCAC designated areas of high segregation and poverty, and poverty status 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 as well as in and around the City of Long Beach. Tracts with larger populations of persons experiencing poverty are also concentrated in these areas.





**Local Trend**

As presented in Figure D-16 above, approximately 11 percent of Commerce residents live below the poverty level. As seen in Figure D-18, the tract in the southern part of Commerce has a higher percentage of persons living in poverty (20 percent to 30 percent) compared to the rest of the City. While no R/ECAPs are located within Commerce, several are nearby including in the city of Bell and the unincorporated County. Several areas of segregation and high poverty are also adjacent to Commerce.

**Figure D-18: Commerce and Surrounding Areas: R/ECAPs, TCAC Areas of High Segregation and Poverty, and Poverty Status by Tract**



Source: HCD AFFH Data Viewer (2018), 2022.



## **Racially/Ethnically Concentrated Areas of Affluence (RCAAs)**

While racially concentrated areas of poverty and segregation (RECAPs) 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. According to a policy paper published by HUD, a RCAA is defined as affluent, White communities. According to HUD's policy paper, "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."

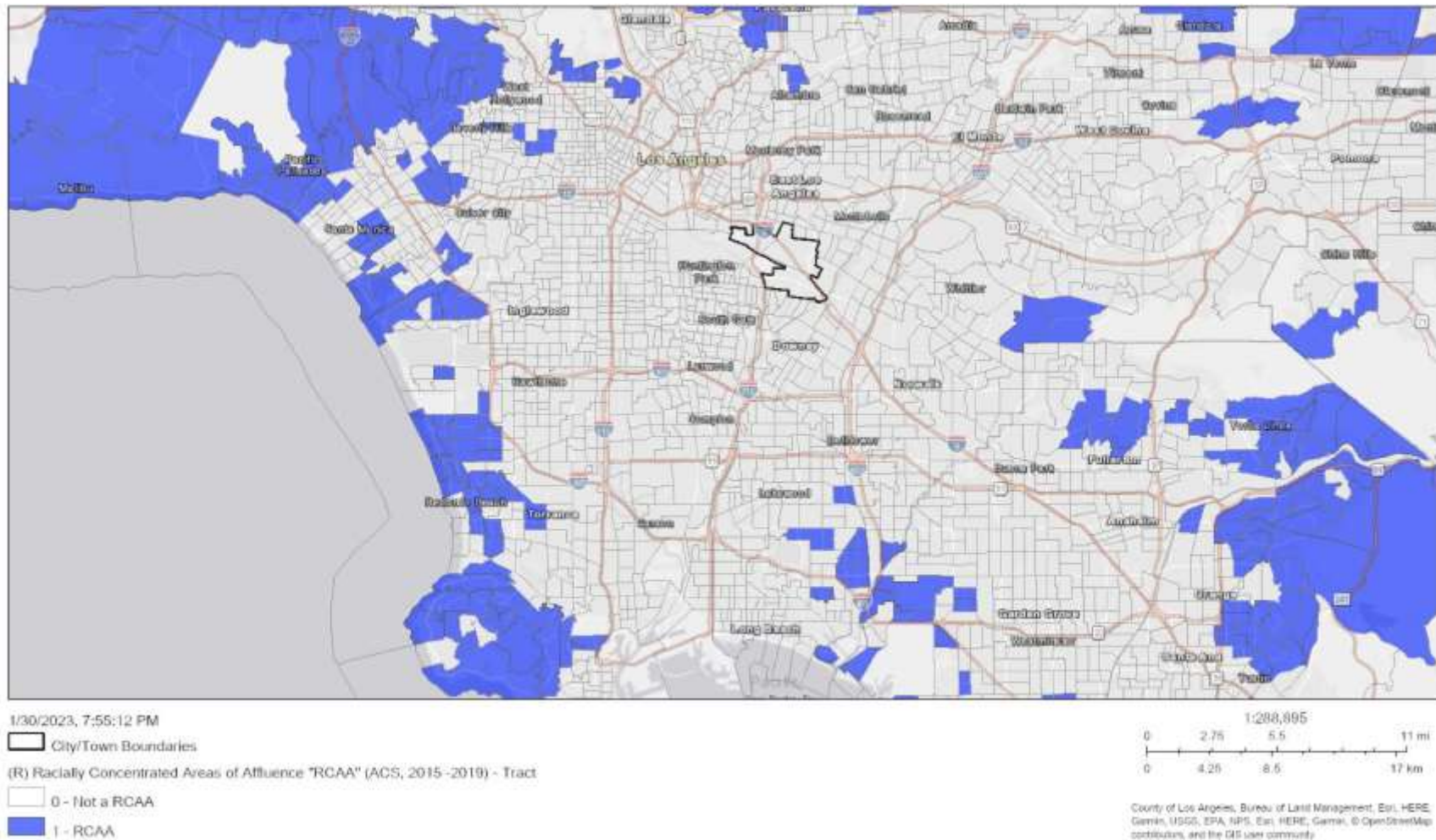
### ***Regional Trend***

As seen in Figure D-19, the RCAAs in Los Angeles County are mostly concentrated in the northwestern portion of the County (Malibu, Calabasas, Agoura Hills), San Gabriel Valley cities and along the coastline, including the cities of Santa Monica, Manhattan Beach, El Segundo, Palos Verdes Estates and Rolling Hills Estates.

### ***Local Trend***

No RCAAs are located within the City of Commerce.

Figure D-19: Regional RCAAs



CA HCD  
 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2018 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022.

## Access to Opportunities

To assess fair access to opportunities regionally and locally, this analysis uses HUD Opportunity Indicators and TCAC Opportunity Area Maps. This section also specifically addresses economic, education, environmental, and transportation opportunities.

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. HUD only provides indicator scores for jurisdictions receiving CDBG funding. Because Commerce receives CDBG funds through the County, opportunity indicator scores are not available. Index scores are based on the following opportunity indicator indices (values range from 0 to 100):

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.

To assist in this analysis, 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 D-9 shows the full list of indicators.

**Table D-9: 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 scores for Los Angeles County are shown in Table D-10. The White population, including the population below the federal poverty line, received the highest scores in low poverty, school proficiency, labor market participation, jobs proximity, and environmental health. Hispanic communities scored the lowest in low poverty and labor market participation and Black communities scored the lowest in school proficiency, jobs proximity, and environmental health. Black residents were most likely to use public transit and have the lowest transportation costs.

As seen in Figure D-20, 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 mostly concentrated in coastal communities from Rolling Hills and Rancho Palos Verdes to Santa Monica, and areas in and around Beverly Hills, La Cañada Flintridge, and Pasadena/Arcadia.

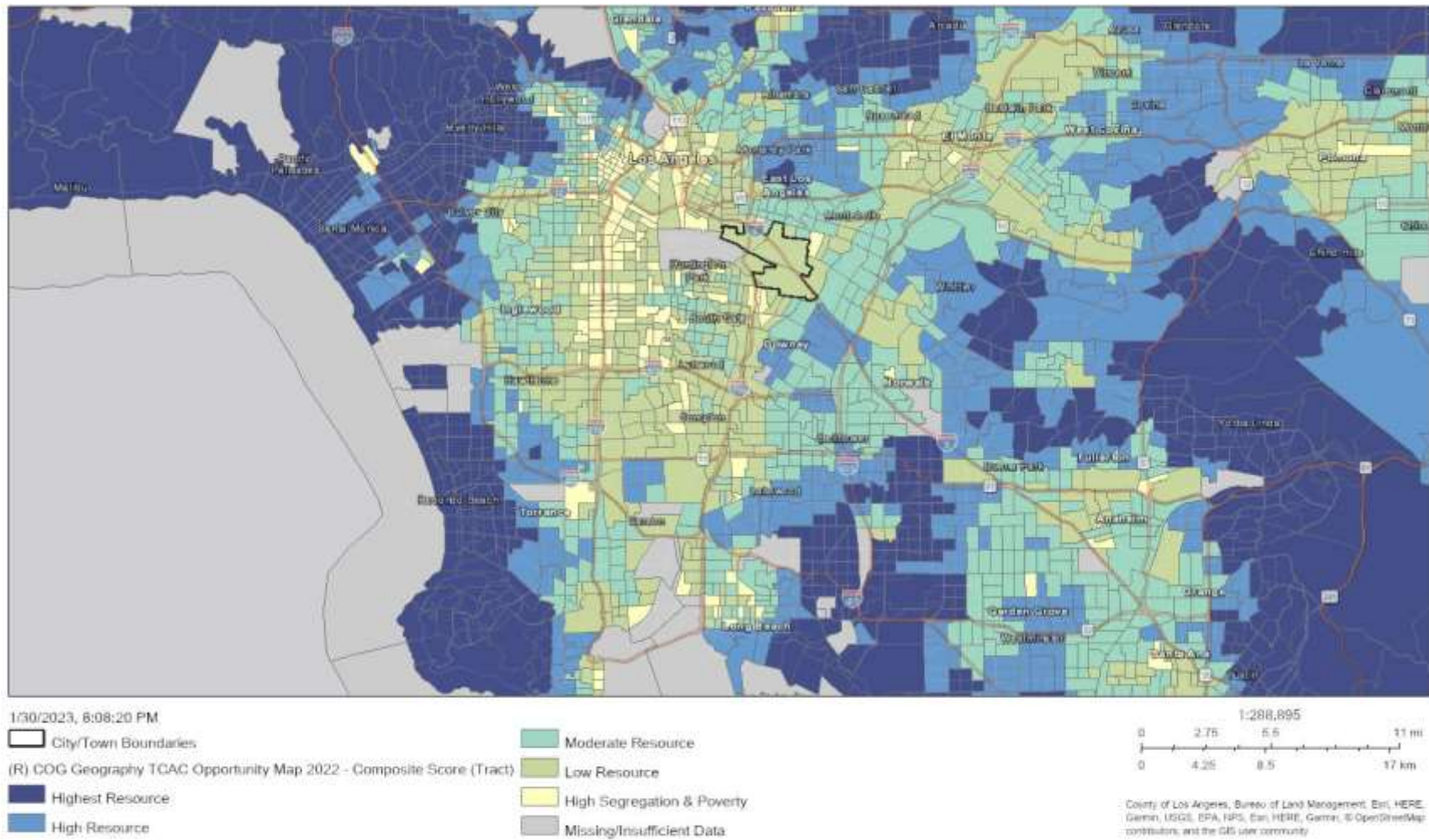
**Table D-10: HUD Opportunity Indicators by Race/Ethnicity – Los Angeles County**

	Low Poverty	School Prof.	Labor Market	Transit	Low Transp. Cost	Jobs Prox.	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 American, non-Hispanic	29.85	35.12	32.02	85.23	78.70	46.35	16.01

Source: HUD AFFH Database – Opportunity Indicators, 2020.



Figure D-20: Regional TCAC Opportunity Areas by Tract



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 | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022.

### **Local Trend**

Opportunity map categorization and domain scores for Commerce census tracts are shown in Table D-11. As seen in the table and Figure D-21, all tracts in the City have a low resource opportunity designation. Tract 2304 (portion of the city south of the railroad) has the lowest economic (0.141) and environmental (0.007) domain scores while tract 2303 (north of the railroad and east of Atlantic Blvd) has the lowest education domain score (0.104).

**Table D-11: Opportunity Map Scores and Categorization for Commerce**

Census Tract	Economic Score	Environmental Score	Education Score	Composite Score	Final Category
6037532302	0.23	0.008	0.257	-0.775	Low Resource
6037532303	0.588	0.015	0.104	-0.595	Low Resource
6037532304	0.141	0.007	0.374	-0.807	Low Resource

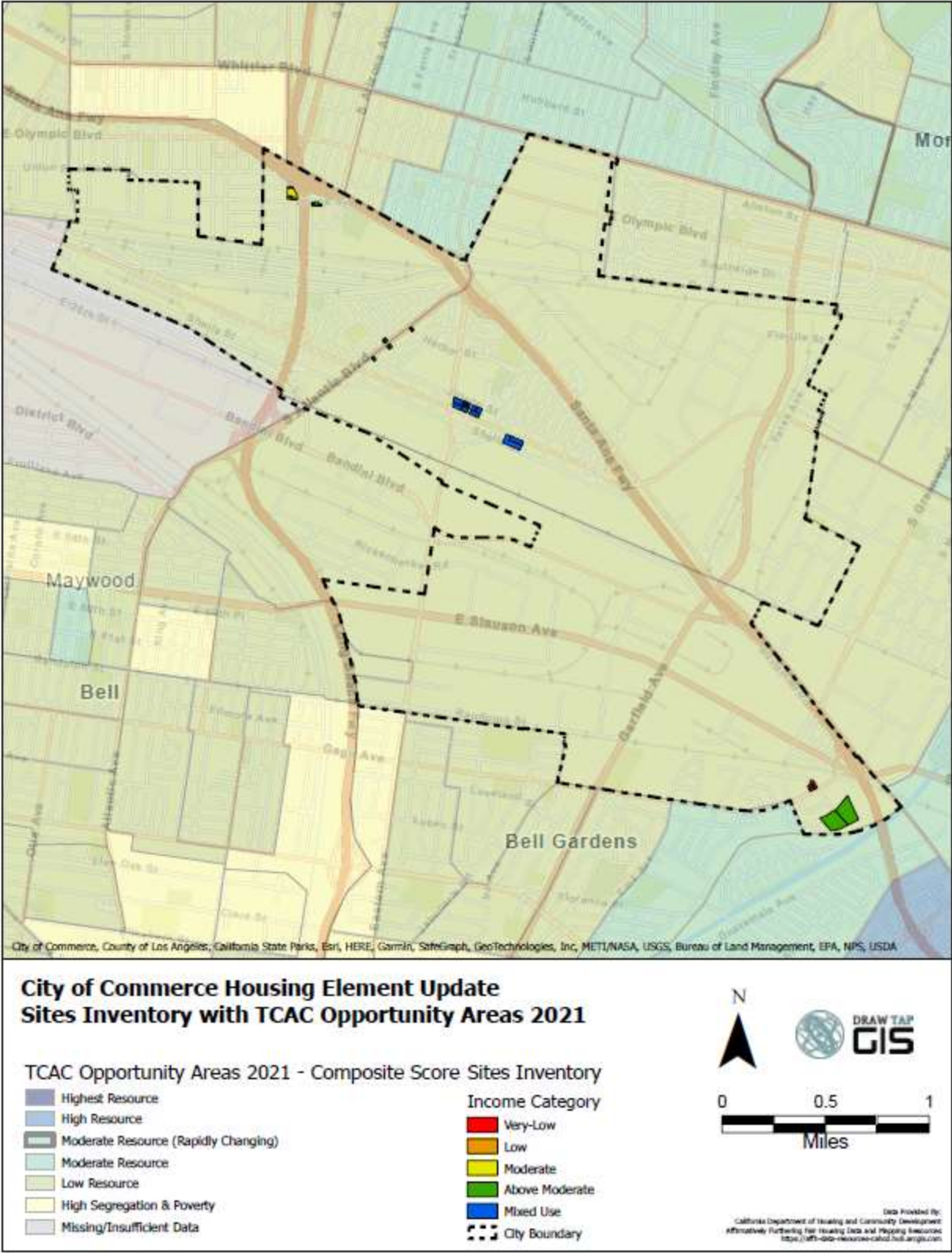
*Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020.*

### **Distribution of RHNA Units by TCAC Opportunity Area**

All census tracts in Commerce are Low Resource TCAC Opportunity Areas. Therefore, the City's RHNA strategy does not concentrate RHNA units of any income level in any particular resource designation.



Figure D-21: TCAC Opportunity Areas and Site Inventory by Tract



Source: HCD AFFH Data Viewer (2018), 2022

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## Economic

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 D-9 for the complete list of TCAC Opportunity Map domains and indicators.

### *Regional Trend*

As presented in Table D-10 above, in Los Angeles County, White residents have the highest labor market participation, while Hispanic residents have the lowest labor market participation. Figure D-22 shows TCAC Opportunity Map economic scores in the Los Angeles region by tract. Consistent with final TCAC categories, tracts with the highest economic scores are concentrated in coastal communities, from the Rancho Palos Verdes to Santa Monica, and areas around Beverly Hills, Pasadena, and Arcadia. 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.

### *Local Trend*

As described above, because Commerce receives CDBG funds through the County, opportunity indicator scores are not available. However, other information can provide insight into the City's overall TCAC Opportunity Map economic scores shown on Figure D-23:

- **Poverty:** As described in the R/ECAP section of this AFFH, Figure D-18 shows that the tract in the southern part of Commerce has a higher percentage of persons living in poverty (20 percent to 30 percent) compared to the rest of the City.
- **Employment:** The Needs Assessment of this Housing Element includes information on employment and income trends for Commerce. Residents living in the City of Commerce are employed in a diverse number of industries, with approximately 26 percent of the population employed in sales and office occupations, 23 percent in service occupations, 21 percent in management, business, science and arts occupations, 20 percent in production, transportation and material moving occupations and 10 percent in natural resources, construction, and maintenance occupations.

Residents employed in management, business, science, and arts occupations have the highest median annual income (\$47,604) in Commerce. Approximately one half of Commerce residents (49 percent) are employed in occupations that earn less than \$30,000 annually (Table 2-4 of the Needs Assessment Chapter).

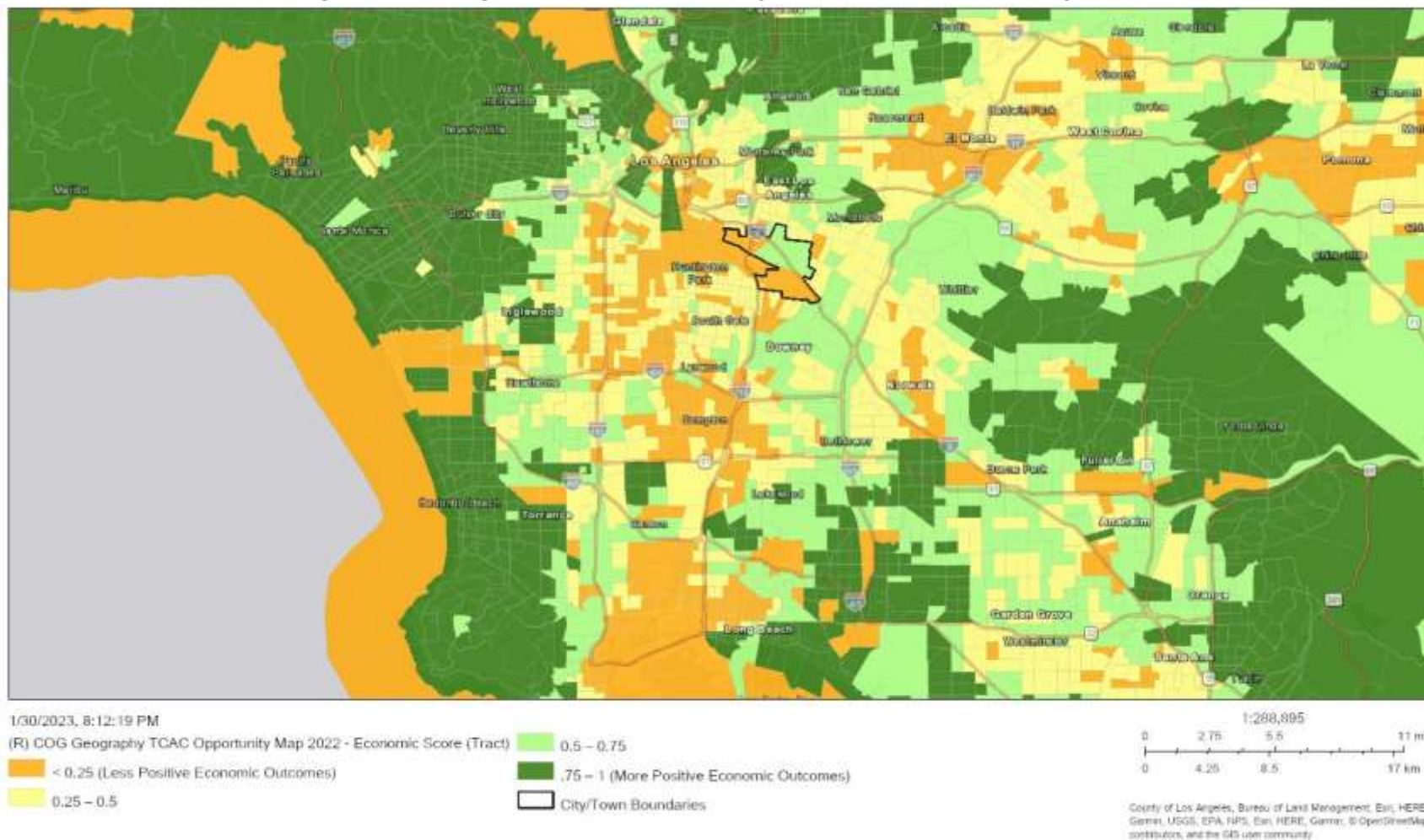
- **Job Proximity:** Figure D-24 shows that jobs are close for residents in Commerce. Transportation to and from jobs are discussed in the Transportation section of this AFFH.
- **Median Home Values:** The Needs Assessment chapter looks at recent median home values in Commerce. In 2021, the median home value in Commerce was \$532,000 per data from Dataquick (CoreLogic).<sup>2</sup> This median home value more than doubled from 2010, when it was \$226,000, and increased by more than 200 percent compared to home values in 2000. Comparing the \$532,000 median home value with affordability levels in LA County, purchasing a home is unaffordable for all low and moderate income households in Commerce.

Table D-11 and Figure D-23 show that tract 2302 (northeast portion of the City) has a higher economic opportunity score (0.588) than the remainder of the City. The residential neighborhoods west of Atlantic Boulevard (Northwest, Bristow, Ayers and Bandini) have lower job proximity scores while the neighborhoods south of the railroad (Lanto Pacific and Veterans Park) have higher poverty rates.

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<sup>2</sup> Data included in the SCAG 2021 Local Profile Dataset for Commerce.

Figure D-22: Regional TCAC Opportunity Area Economic Scores by Tract



CA HCD  
 County of Los Angeles, Bureau of Land Management; Esri, HERE, Garmin, (USGS, EPA, FIPS) | PlaceWorks 2021, HUD 2018 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022 | PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

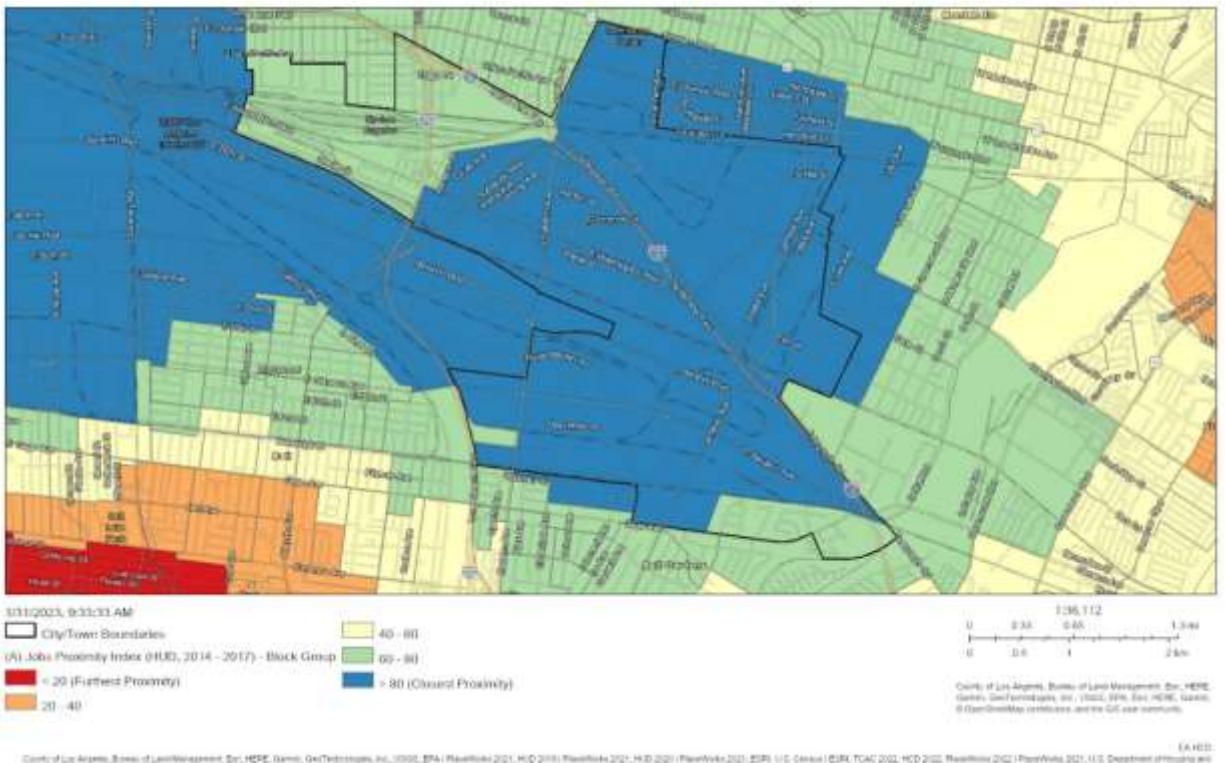


**Figure D-23: Commerce TCAC Opportunity Area Economic Scores by Tract**



Source: HCD AFFH Data Viewer (2018), 2022.

**Figure D-24: Job Proximity in Commerce**



Source: HCD AFFH Data Viewer (2018), 2022

## **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. See Table D-9Table D-1 for the complete list of TCAC Opportunity Map domains and indicators.

## **Regional Trend**

As presented in Table D-10 previously, White Los Angeles County communities are located closest to the highest quality school systems, while Black communities are typically located near lower quality school systems. TCAC Opportunity Map education scores for the region are shown in Figure D-25. 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 around the San Pedro community and City of Long Beach. Coastal communities, and areas near Arcadia, Whittier, and Beverly Hills have the highest education scores.

## **Local Trend**

Commerce is served by the Montebello Unified School District. Bandini Elementary School (grades K through 5) is located west of Atlantic Boulevard in the Bandini residential neighborhood. Rosewood Park (grades K through 8) school is located south of the I-5 freeway, north of Harbor Boulevard and between the Village and Rosewood residential neighborhoods. High school students in Commerce attend Bell Gardens High School located in the City of Bell Gardens.

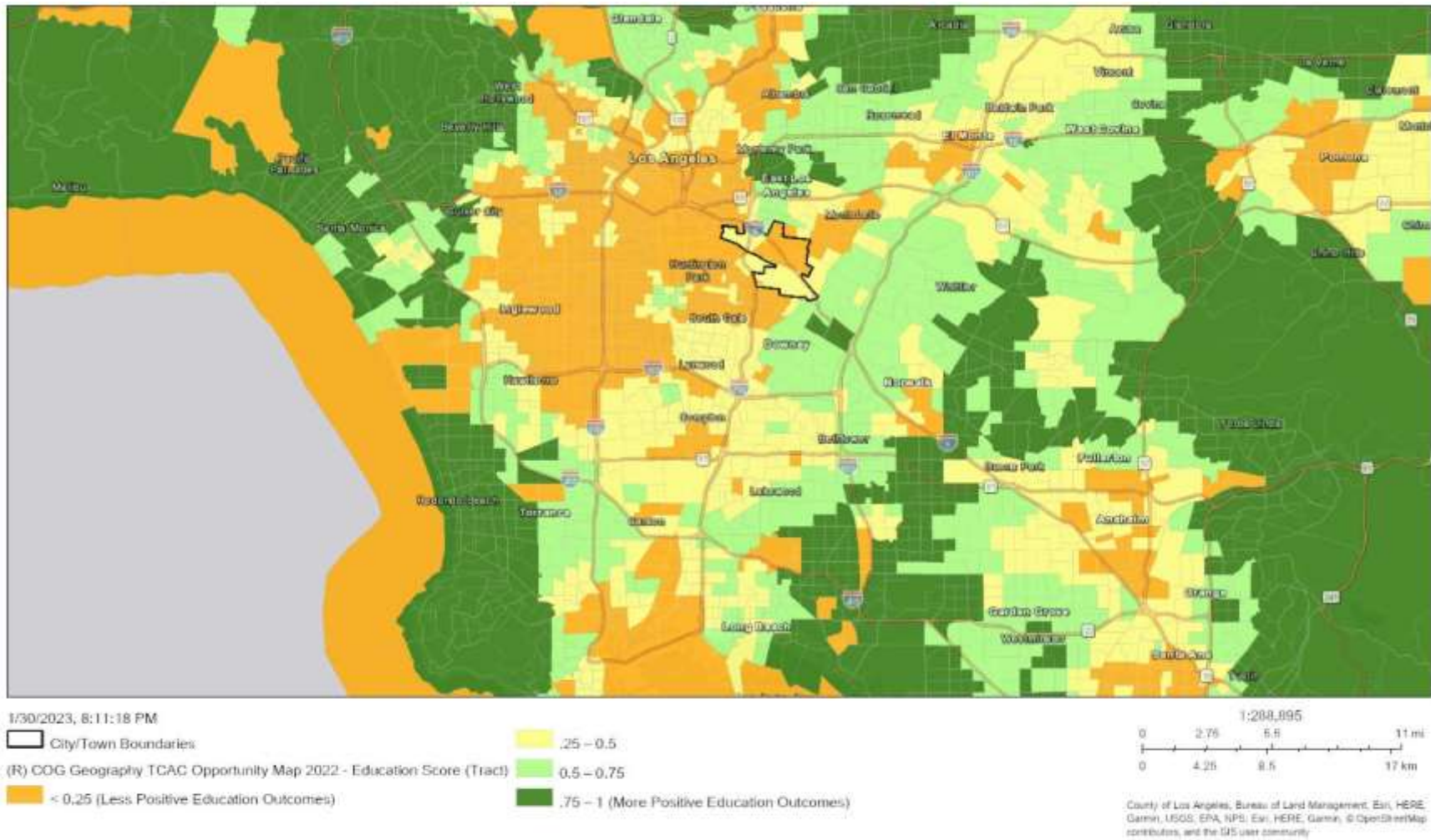
GreatSchools.org is a non-profit organization that rates schools across the Country. The GreatSchools Summary Rating calculation is based on four ratings: Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average,” 5-6 indicate “average,” and 7-10 are “above average.”<sup>3</sup> The GreatSchools website had the following ratings for the schools serving Commerce students:

- Bandini Elementary School – 5
- Rosewood Park School – 4
- Bell Gardens High School - 2

The TCAC Opportunity Map education scores for Commerce are shown in Table D-11 and Figure D-26. Overall, the City has lower education opportunities (0.5 or less), with tract 2303 (including the Rosini, Village, Rosewood and Ferguson residential neighborhoods) having the least positive (< 0.25) education opportunity score.

<sup>3</sup> For more information of GreatSchools ratings, visit: <https://www.greatschools.org/gk/ratings/>

Figure D-25: Regional TCAC Opportunity Area Education Scores by Tract



Source: HCD AFFH Data Viewer (2018), 2022



**Figure D-26: Commerce TCAC Opportunity Area Education Scores by Tract**

Source: HCD AFFH Data Viewer (2018), 2022

## 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.

### Regional Trend

As seen in Table D-10, Black residents Countywide are most likely to experience adverse environmental health conditions, while White residents are the least likely. A larger proportion of Los Angeles County has environmental scores in the lowest percentile compared to economic and education scores (Figure D-27). The central Los Angeles County, San Gabriel Valley, and South Bay areas all have concentrations of tracts with environmental scores in the lowest percentile. Tracts with the highest environmental scores are in western South Bay areas (i.e., Rolling Hills and Redondo Beach), and areas around Inglewood, Altadena, Whittier, Lakewood, and Malibu.

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### ***Local Trend***

As seen in Figure D-28, all of Commerce has the least positive TCAC Opportunity Map environmental scores (<0.25). In addition, OEHHA released updated scores in February 2020 (CalEnviroScreen 4.0). The CalEnviroScreen 4.0 scores in Figure D-29 are based on percentiles and show that all tracts in Commerce have the highest (worst) scores.

Access to parks, recreation, and open space is also crucial to healthy communities. To affirmatively further fair housing, all residents, regardless of demographics, should have access to recreational areas and open space. Parks and recreational opportunities in Commerce include four neighborhood parks (two in the western portion of the city, one in the north central area and one in the southeast corner), six community centers and an aquatic center. In addition, Camp Commerce, located in Lake Arrowhead, is available to family weekends, senior citizen weekends and summer camping opportunities for Commerce residents.

### ***Distribution of RHNA Units by CalEnviroScreen Scores***

All census tracts in Commerce have the highest (worst) CalEnviroScreen 4.0 score. The City's RHNA strategy does not disproportionately concentrate RHNA units of any income level in areas with worse environmental scores.

Figure D-27: Regional TCAC Opportunity Area Environmental Scores by Tract



Source: HCD AFFH Data Viewer (2018), 2022

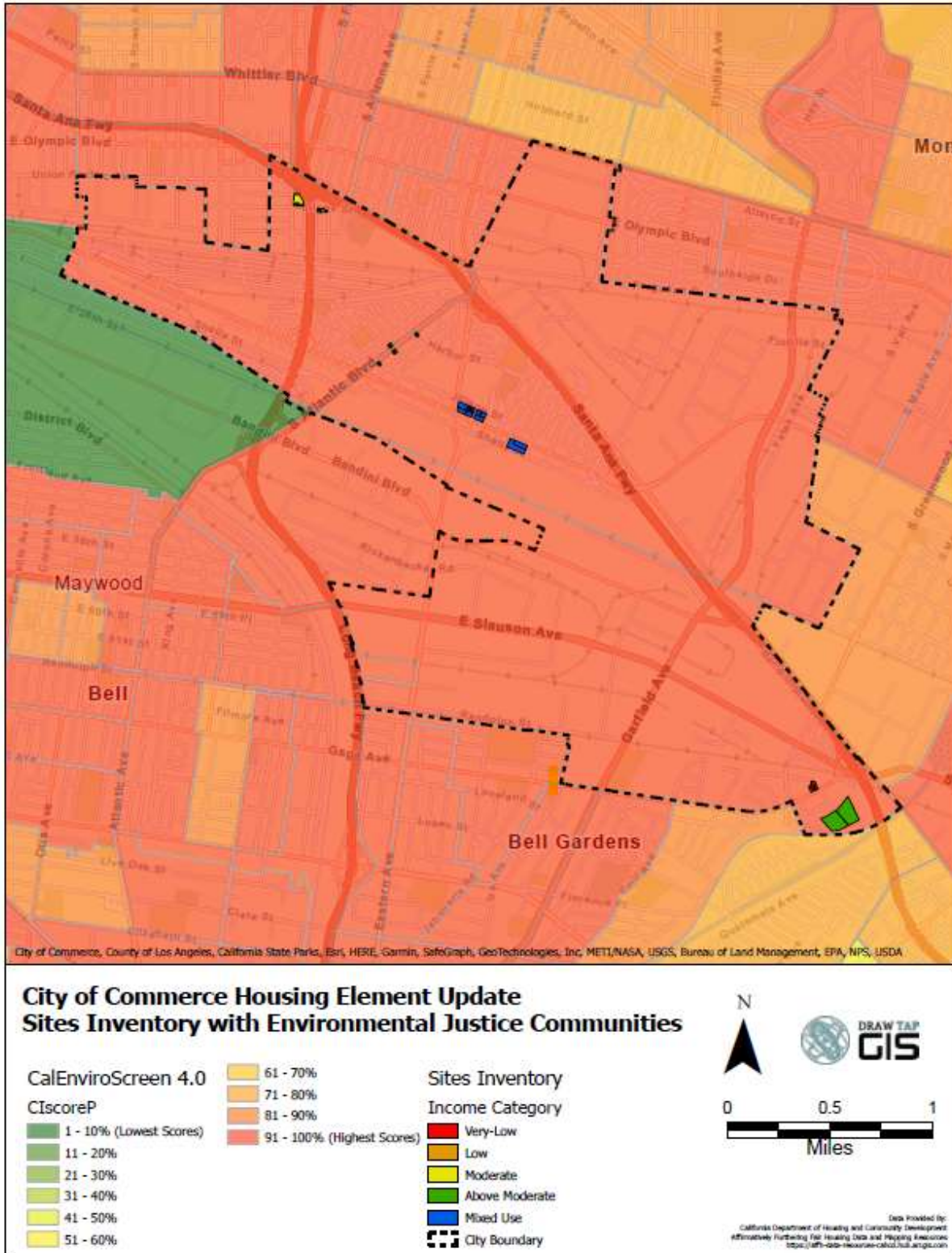


Figure D-28: Commerce TCAC Opportunity Area Environmental Scores by Tract



Source: HCD AFFH Data Viewer (2018), 2022

Figure D-29: Commerce CalEnviroScreen 4.0 Scores



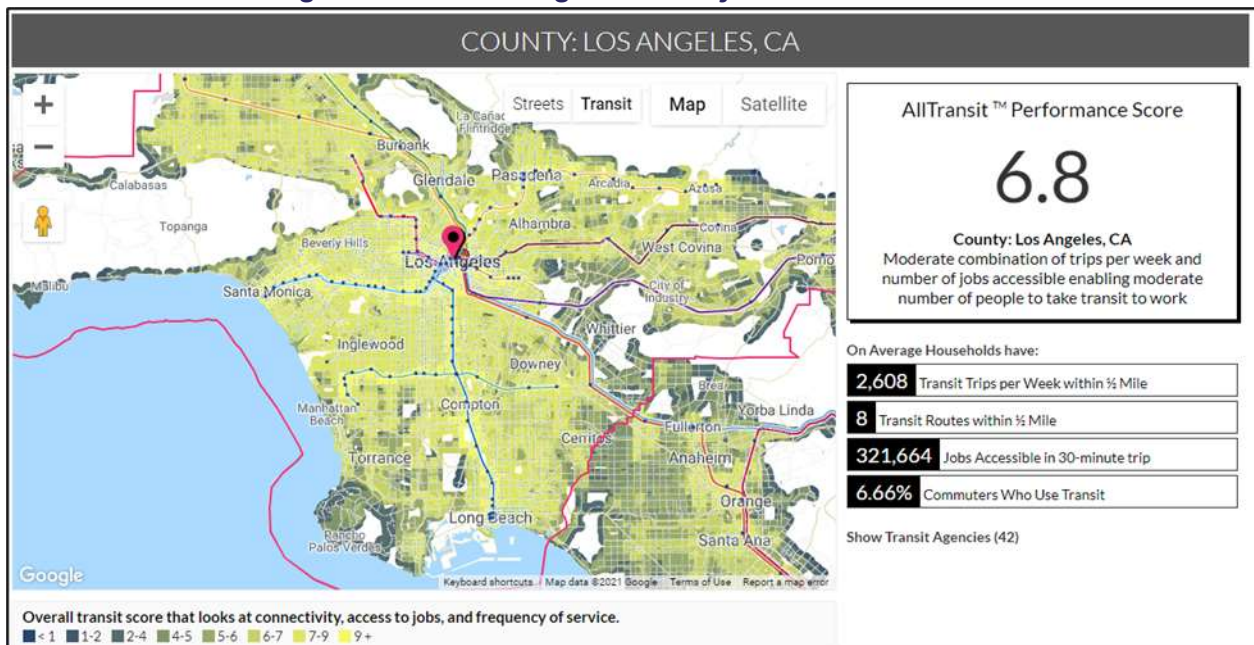
Source: HCD AFFH Data Viewer (2018), 2022

## Transportation

### 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. Commerce’s All Transit Performance score of 7.6 is higher than Bell (7.3), Bell Gardens (6.3), Downey (6.9), Maywood (6.5), Montebello (2.8), Pico Rivera (3.9) and the County (6.8). Los Angeles County All Transit metrics are shown in Figure D-30. 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 94 percent of jobs and 90 percent of workers are located within one-half mile from transit.

**Figure D-30 : Los Angeles County AllTransit Metrics**



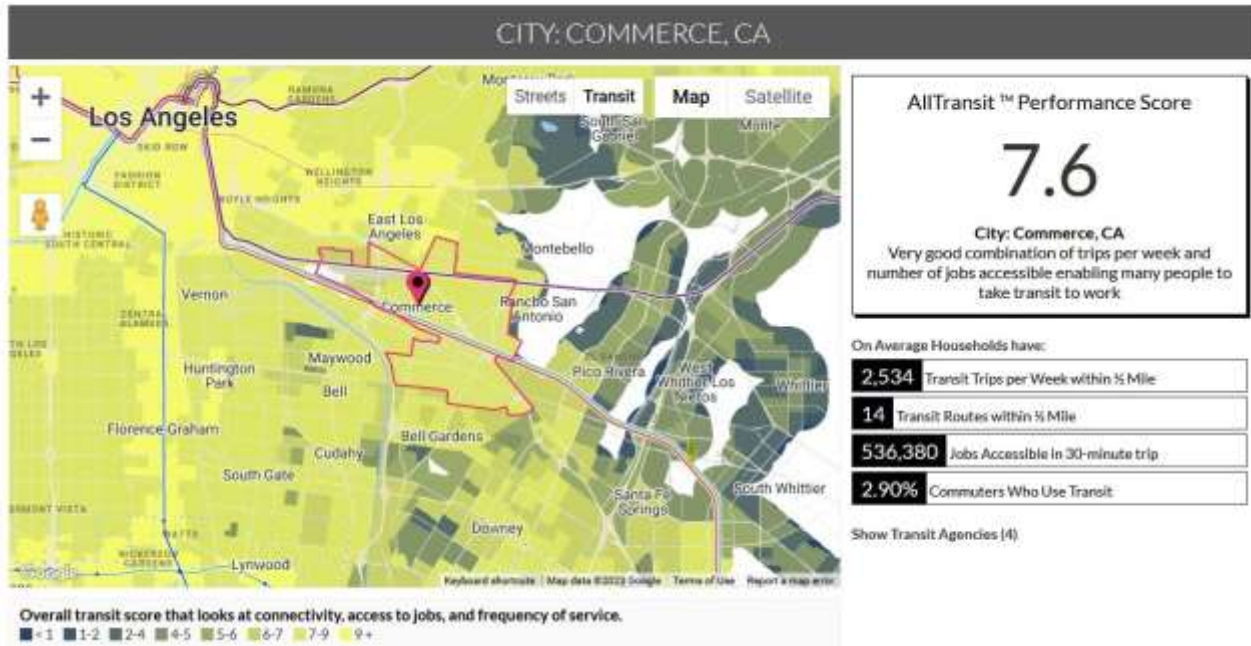
Source: All Transit Metrics: All Transit Performance Score – Los Angeles County, 2019

### Local Trend

As seen in Figure D-31, Commerce has an All Transit Performance Score of 7.6. This score reflects a very good combination of trips per week and number of jobs accessible enabling many people to take transit to work. All Transit estimates 99 percent of jobs and 99 percent of workers in Commerce are located within ½ a mile from transit.



Figure D-31: Commerce AllTransit Metrics



Source: All Transit Metrics: All Transit Performance Score – Commerce, 2019.

The following transit services are available in Commerce:

- Commerce Metrolink Station (located at 6433 26th Street, west of Garfield and north of Bandini). This station is a Metrolink Orange Line stop. The Orange Line travels between Los Angeles Union Station south through central Los Angeles County, Orange County and ending in San Diego County (Oceanside).
- City of Commerce Municipal Bus Lines: multiple bus routes travel throughout the city of Commerce and make connections to regional destinations. All transit bus services are fare free. Figure D-32 shows the transit routes in Commerce.

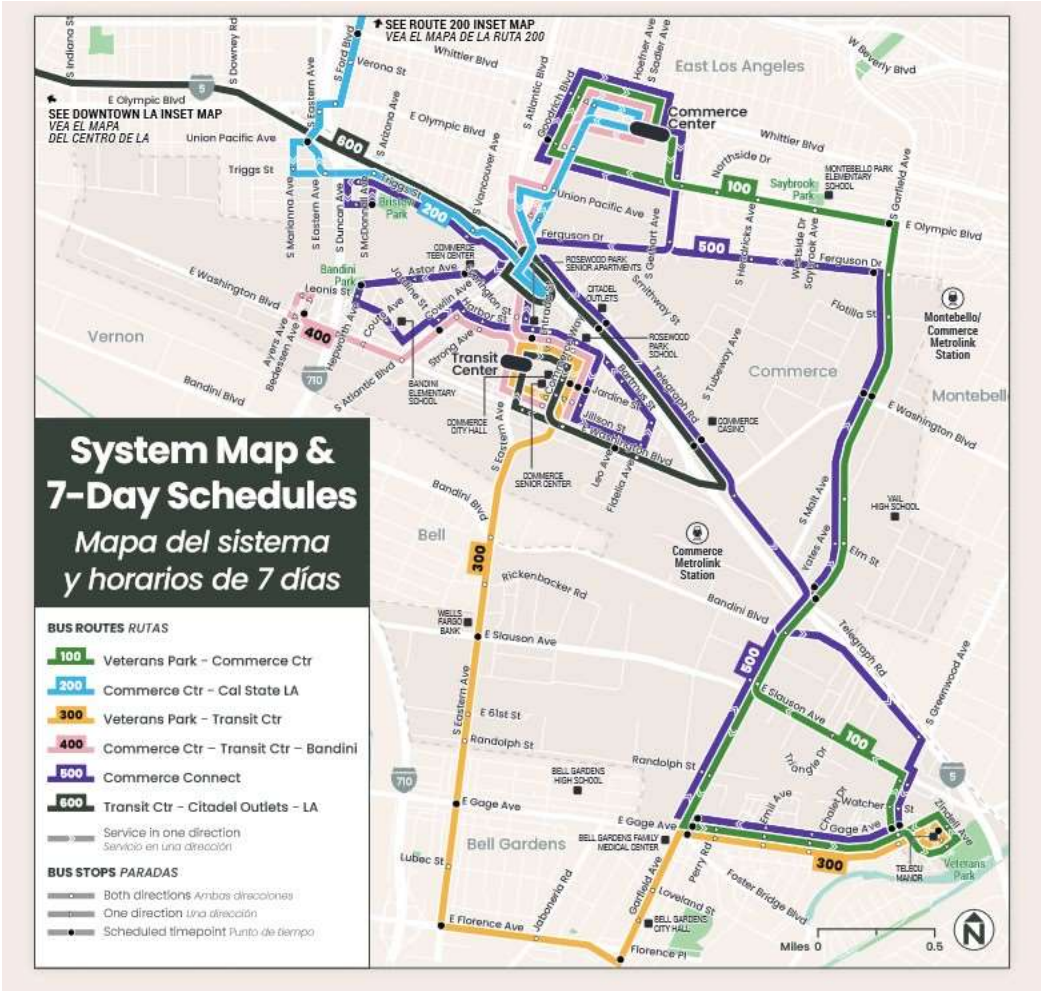
In February 2020, the Commerce in Motion Final Report was published by the City. The report, which included extensive public engagement, analyzed the City’s transit system and developed recommendations aimed at improving access, reducing travel times and increasing ridership. The report developed a “Preferred Alternative”, which included the following themes:

- Higher frequency service
- Faster, more direct service
- Bi-directional service
- Service to more locations outside of the City of Commerce
- Improved, consistent weekend service

One strategy from the Commerce in Motion Report that has been implemented is an on-demand connection service to the Commerce Metrolink Station. The new Micro Transit allows people to call and arrange for a ride to the Metrolink Station rather than waiting for a fixed route shuttle.



Figure D-32: City of Commerce Transit Routes



Source: City of Commerce Transportation Department, 2023.

Based on the City’s Transit Routes and the number of major arterials that intersect Commerce, a majority of residents are in close proximity to transit stops. The two neighborhoods that are further away are the Ayers neighborhood just west of the 710 freeway and the Darwell neighborhood in the southern portion of the city adjacent to Bell Gardens.

## Disproportionate Housing Needs

The AFFH Rule Guidebook defines ‘disproportionate housing needs’ as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area” (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Seaside. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30% of gross income; or
- Severe housing cost burden, including utilities, exceeding 50% of gross income
- Overcrowded conditions (housing units with more than one person per room)
- Units with physical defects (lacking complete kitchen or bathroom)

According to CHAS data based on the 2015-2019 ACS (the most recent dataset available), approximately one half of Los Angeles County and Commerce households experience housing problems. In both the County and City, renters are more likely to be affected by housing problems than owners.

## Cost Burden

### *Regional Trend*

In Los Angeles County, approximately 53 percent of renter households experience cost burden compared to 34 percent of owner households (Table D-12). Black or African American households face the highest rates of overall cost burden (52 percent) as well as owner-occupied and renter-occupied cost burden (40 percent and 59 percent, respectively). White and Pacific Islander households experience the lowest rate of owner-occupied cost burden (31 percent) and Pacific Islander households also have the lowest rate of renter-occupied cost burden (45 percent).

Figure D-33 and Figure D-34 show concentrations of cost burdened owners and renters by tract for the region. Tracts with high concentrations of cost burdened owners are generally dispersed throughout the County. Overpaying owners are most prevalent in the central County areas, in the westside cities of Santa Monica and Beverly Hills, and parts of the San Gabriel Valley. Most of the tracts around Commerce range from 20 percent to 60 percent cost burdened owners. There is a higher concentration of cost burdened renters countywide. More than 40 percent of renters overpay for housing in most Los Angeles County tracts. Tracts where more than 60 percent of renters are cost burdened are most concentrated in the central County areas around Inglewood and the City of Los Angeles, Long Beach, eastern County cities including Norwalk, and parts of the San Gabriel Valley.

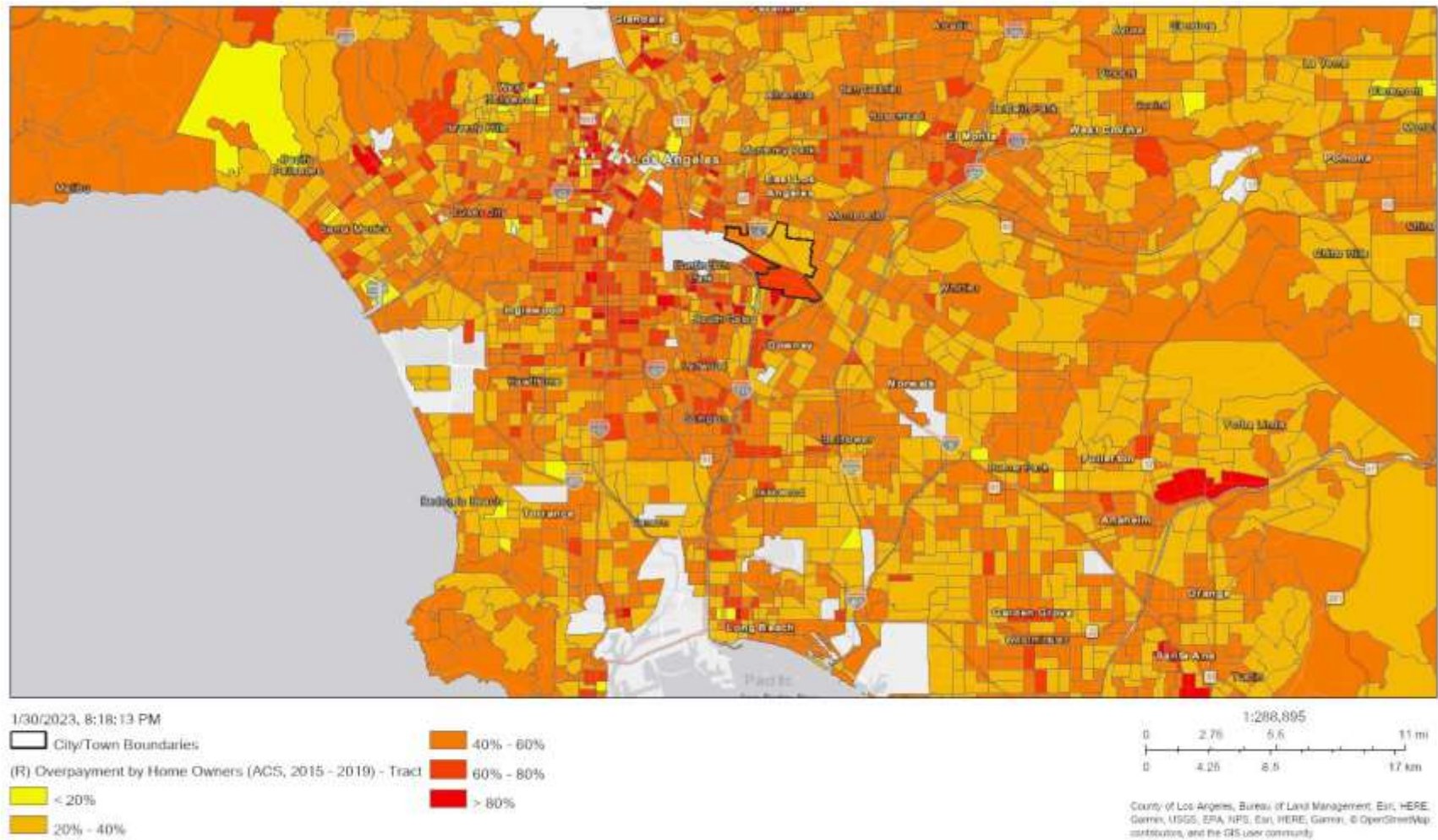
**Table D-12: Los Angeles County Housing Problems By Race**

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
<b>With Housing Problem</b>							
Owner-Occupied	31.7%	41.3%	36.7%	34.7%	41.6%	45.8%	37.8%
Renter-Occupied	51.9%	62.7%	56.1%	56.1%	54.0%	69.4%	61.2%
<i>All Households</i>	41.0%	55.5%	45.7%	47.0%	49.5%	60.3%	50.5%
<b>With Cost Burden &gt;30%</b>							
Owner-Occupied	30.7%	39.8%	33.0%	33.1%	31.0%	36.7%	33.7%
Renter-Occupied	48.6%	58.8%	47.3%	51.3%	45.3%	56.1%	52.8%
<i>All Households</i>	38.9%	52.4%	39.7%	43.6%	40.1%	48.6%	44.1%

*Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers. In the 2015-2019 CHAS data, the "other" race category (such as multiple races) is not included.*

*Source: HUD CHAS, (2015-2019).*

Figure D-33: Regional Cost Burden - Owners

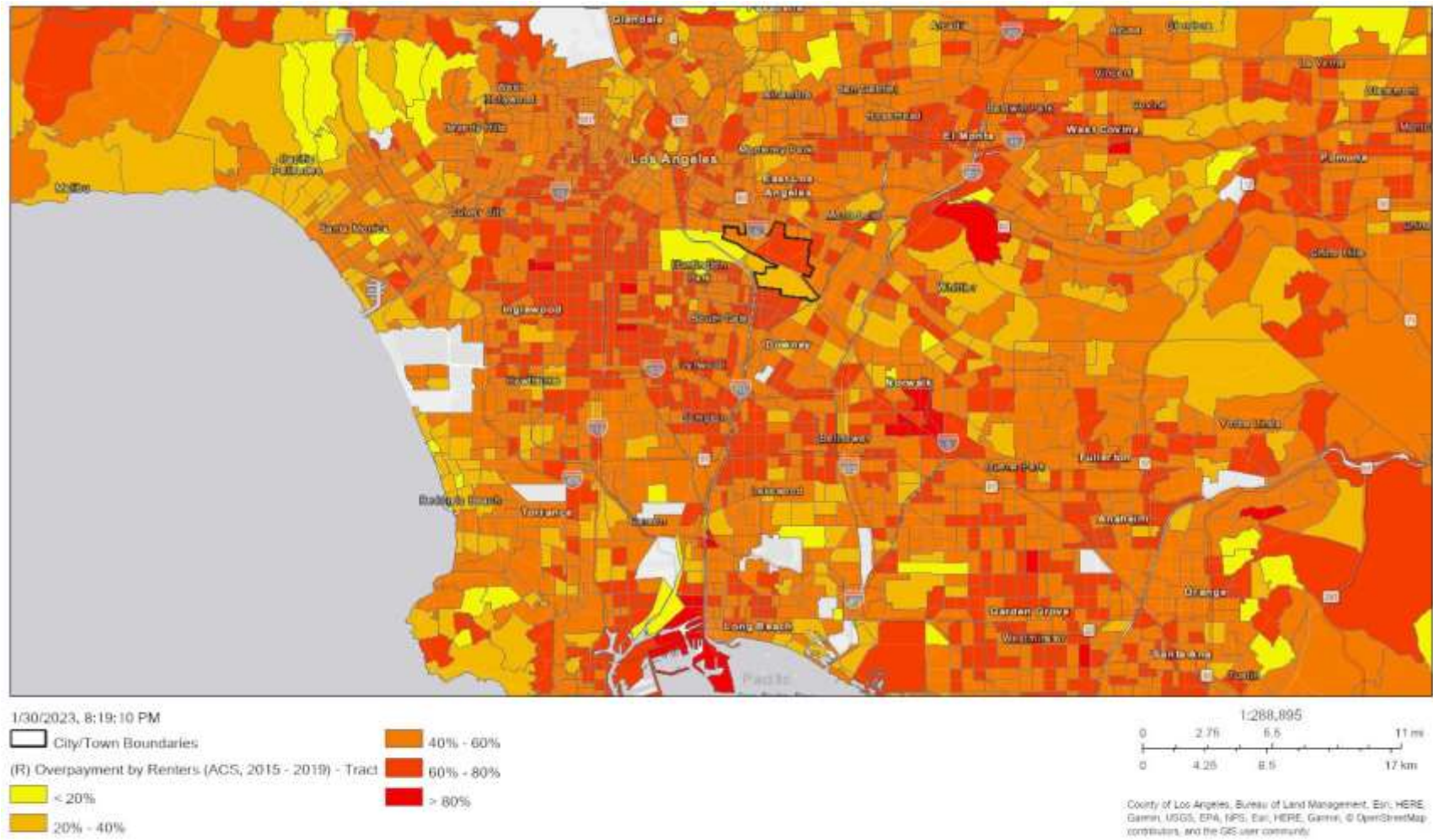


CA HCD  
 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS User community

Source: HCD AFFH Data Viewer (2018), 2022



Figure D-34: Regional Cost Burden - Renters



CA HCD: County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, FIPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

### Local Trend

Table D-13 shows housing problems, including cost burden, in Commerce. Over half (55 percent) of renter households experience housing problems in the city. Approximately 46 percent of these households cost burdened. A smaller percentage of owner households have housing problems (45 percent), including cost burden (35 percent). All American Indian and Alaska Native households in Commerce are cost burdened. Approximately 55 percent of White owner households and 20 percent of renter households face cost burden. A greater percentage of Hispanic renter households are cost burdened compared to owner households (47 percent and 34 percent, respectively). No Black or African American or Asian households face housing problems or cost burden in the city.

**Table D-13: Commerce Housing Problems By Race**

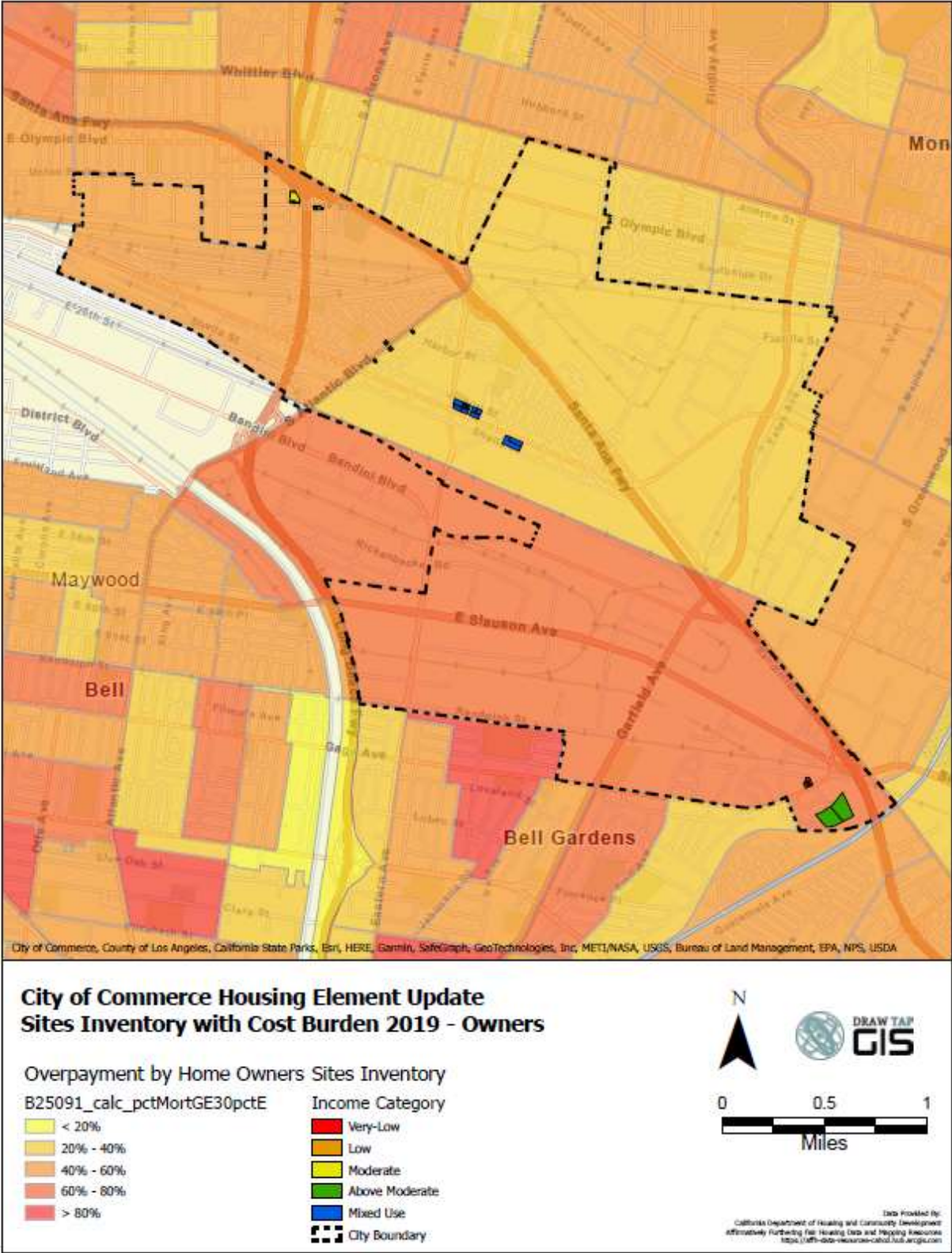
	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With Housing Problem							
Owner-Occupied	56.3%	---	0.0%	100%	---	44.4%	44.6%
Renter-Occupied	40.0%	0.0%	---	---	---	57.5%	55.7%
<i>All Households</i>	53.0%	0.0%	0.0%	100%%	---	51.5%	50.5%
With Cost Burden >30%							
Owner-Occupied	55.0%	---%	0.0%	100%	---	34.0%	35.2%
Renter-Occupied	20.0%	0.0%	---	---	---	47.2%	45.7%
<i>All Households</i>	48.0%	0.0%	0.0%	100%	---	41.1%	40.8%

*Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers. In the 2015-2019 CHAS data, the "other" race category (such as multiple races) is not included.*

*Source: HUD CHAS, (2015-2019).*

Figure D-35 and ~~Figure D-36~~ [Figure D-36](#) shows the geographic distribution of cost burdened households in Commerce. Approximately 40 to 60 percent of owner and renter households west of Atlantic Boulevard (includes the Bandini, Ayers, Northwest and Bristow neighborhoods) experience cost burden. For households east of Atlantic Boulevard and north of the railroad (includes the Rosini, Village, Rosewood and Ferguson neighborhoods), 20 to 40 percent of owners and 60 to 80 percent of renters are cost burdened. In the area of the City south of the railroad (Lanto Pacific, Darwell and Veterans Park), 60 to 80 percent of owner households and 20 to 40 percent of renter households experience cost burden.

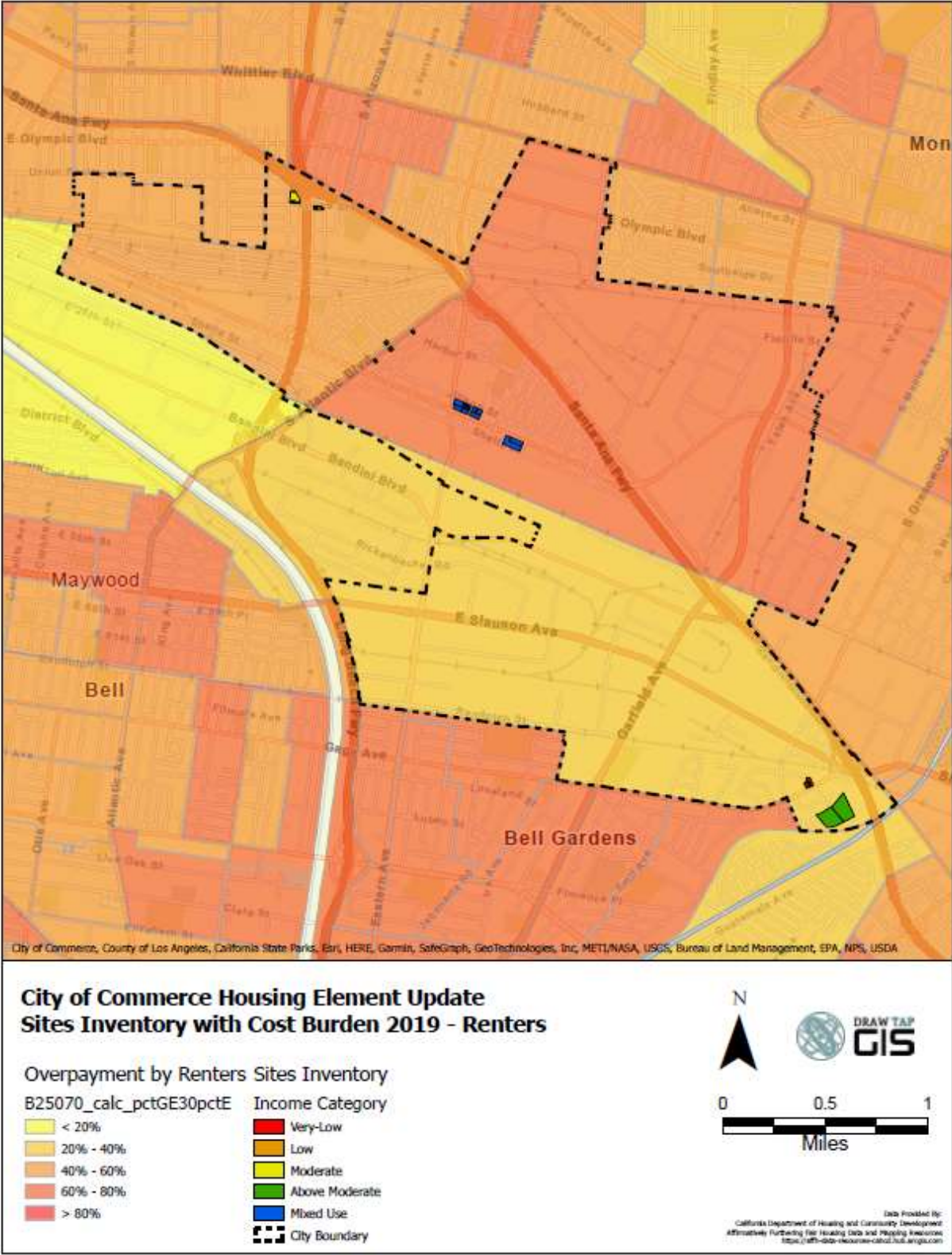
Figure D-35: Commerce Cost Burden and Site Inventory – Owners



Source: HCD AFFH Data Viewer (2018), 2022



Figure D-36: Commerce Cost Burden and Site Inventory – Renters



Source: HCD AFFH Data Viewer (2018), 2022

### ***Distribution of RHNA Units by Cost Burdened Households***

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units credited toward meeting the RHNA are located in the approved Modelo Specific Plan development. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175 percent of AMI). Table D-14 and Table D-15 show the unit distribution by cost burdened homeowner and renter households, respectively. Regarding homeowner cost burden, most of the lower income units (92 percent) and moderate income units (82 percent) are placed in areas with the lowest cost burden (20 to 40 percent). Thus, the RHNA is not exacerbating homeowner cost burden in Commerce. The Modelo Specific Plan provides a significant number of new units in the City, offering opportunity to moderate housing prices by addressing the shortage issues. This project will not impact the rental housing market but can assist some renters to become homeowners.

**Table D-14: RHNA Unit Distribution by Cost-Burdened Homeowner Households**

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	143	92.3%	79	82.3%	102	10.5%	324	26.6%
40-60%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
60-80%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

**Table D-15: RHNA Unit Distribution by Cost-Burdened Renter Households**

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
40-60%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
60-80%	143	92.3%	79	82.3%	102	10.5%	324	26.6%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

## 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. Data from the 2016-2020 ACS and the HCD AFFH Data Viewer are used to show overcrowding in Commerce and Los Angeles County.

### Regional Trend

According to the 2020 five-year ACS estimates, about 11 percent of households in the County are living in overcrowded conditions (Table D-16). This is higher than the statewide average of 8.2 percent. About 16 percent of renter households are living in overcrowded conditions, compared to six percent of owner households. In addition, approximately seven percent of renter households and two percent of owner households are living in severely overcrowded conditions (more than 1.5 persons per room).

**Table D-16: Los Angeles County Overcrowded Households**

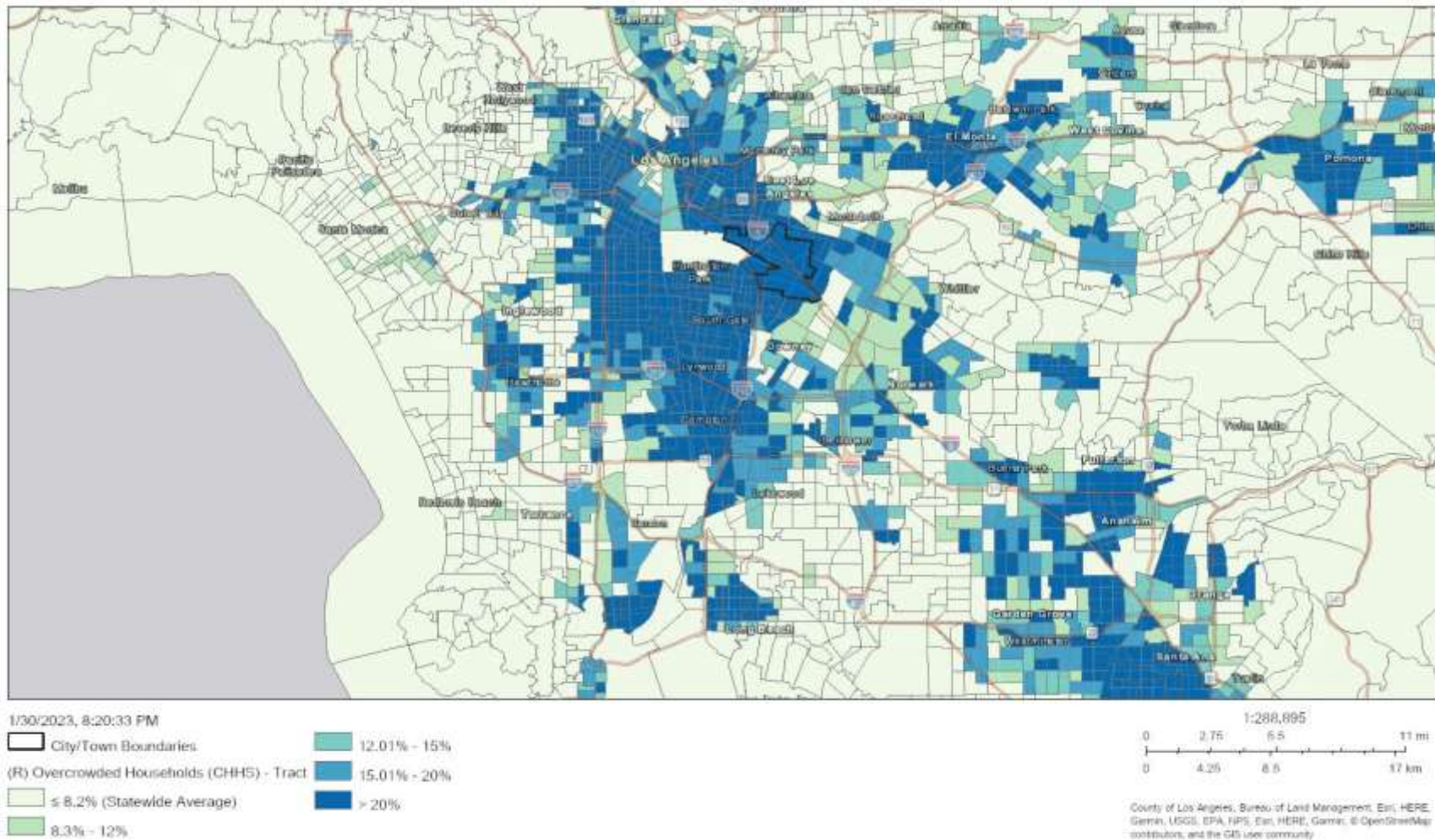
	Owner-Occupied	Renter-Occupied	All Households
Overcrowded (>1 person per room)	5.7%	16.0%	11.2%
Severely Overcrowded (>1.5 persons per room)	1.6%	7.4%	4.7%
Total Households	1,534,472	1,798,032	3,332,504

Source: 2016-2020 ACS, Table B25014

Figure D-37 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. Commerce and areas around the City have concentrations of overcrowded households greater than 20 percent. This includes Bell, Bell Gardens, Maywood, Huntington Park and unincorporated County areas.



Figure D-37: Regional Overcrowded Households by Tract



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, FIPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, Esri, U.S. Census | Esri, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

### Local Trend

As seen in Table D-17, approximately 16 percent of Commerce residents are living in overcrowded conditions. This is higher than the County (11 percent) and statewide average (8.2 percent). Nineteen percent of renter households in Commerce are overcrowded compared to 13 percent of owner households. Severe overcrowding impacts eight percent of renter households and one percent of owner households in the City. This is a decrease in overcrowding from 2006-2010 when approximately 27 percent of renter households and 23 percent of owner households in Commerce were overcrowded (2002-2010 ACS data).

**Table D-17: Commerce Overcrowded Households**

	Owner-Occupied	Renter-Occupied	All Households
Overcrowded (>1 person per room)	13.3%	19.1%	15.9%
Severely Overcrowded (>1.5 persons per room)	1.0%	8.4%	4.3%
Total Households	1,933	1,570	3,503

Source: 2016-2020 ACS, Table B25014

### Distribution of RHNA Units by Overcrowded Households

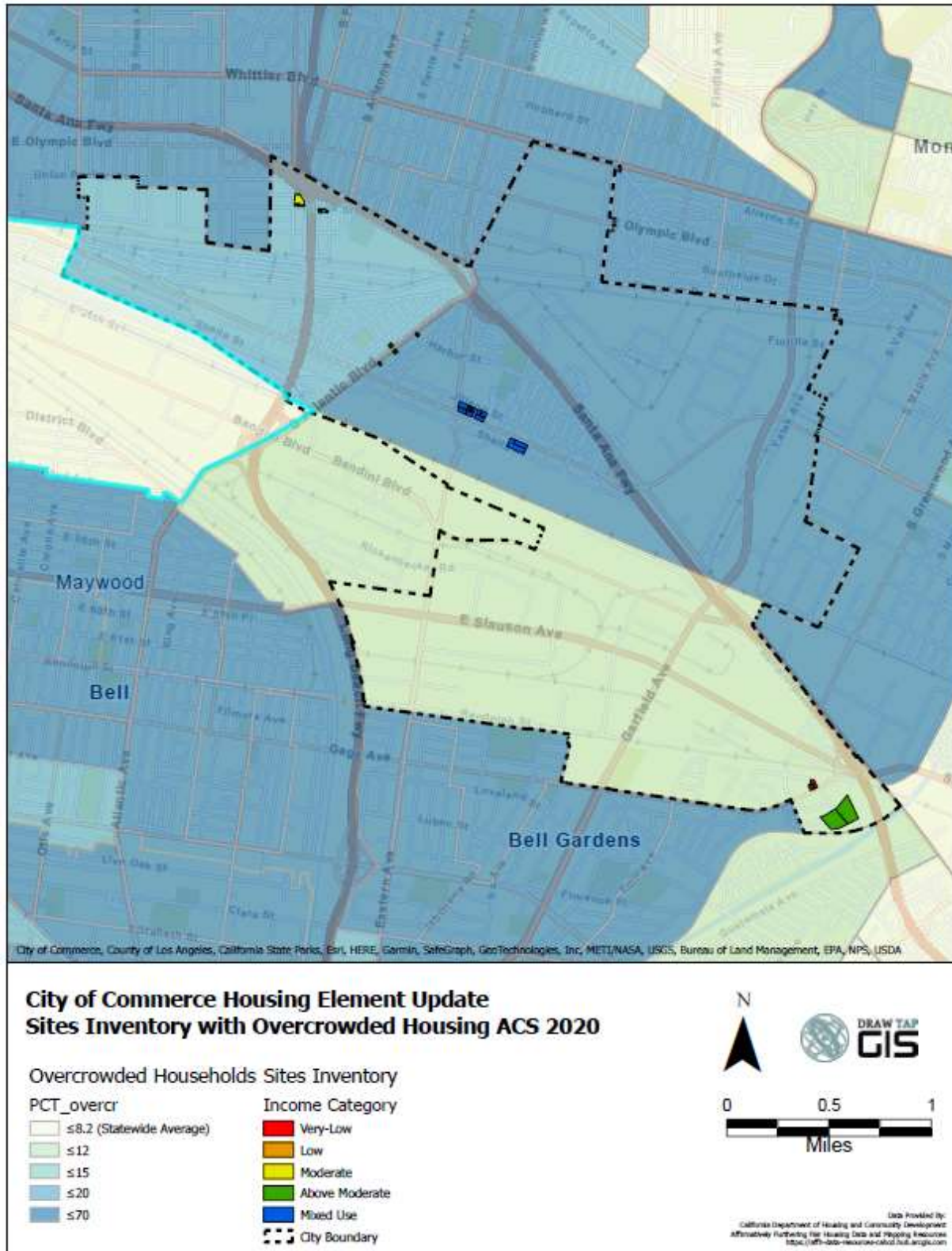
Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units credited toward meeting the RHNA are within the approved Modelo Specific Plan development. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175% percent of AMI).

Table D-18 shows the unit distribution by overcrowded households. Regarding the RHNA's income level distribution, most of the units that are not in the Modelo Specific Plan are located in areas with the largest percentage of overcrowding (>20%). This includes units in all income levels, providing additional housing opportunities for households of all incomes that may be facing overcrowding. The Modelo Specific Plan also offers large units to accommodate multigenerational living. Therefore, the City's RHNA strategy does not exacerbate the overcrowding in Commerce.

**Table D-18: RHNA Unit Distribution by Overcrowded Households**

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<8.2% (State Avg)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
8.3-12%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
12.1-15%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
15.1-20%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
>20%	143	92.3%	79	82.3%	102	10.5%	324	26.6%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

Figure D-38: Commerce Overcrowded Households and Site Inventory by Tract



Source: HCD AFFH Data Viewer (2018), 2022



## Substandard Housing

Incomplete plumbing or kitchen facilities and housing stock age can be used to measure substandard housing conditions. Data for incomplete facilities and housing age are based on the 2016-2020 ACS. 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 one percent of households in the County lack complete plumbing facilities and less than two percent lack complete kitchen facilities (Table D-19). Incomplete facilities are more common amongst renter occupied households. Only 0.4 percent of owner households lack complete kitchen facilities compared to 2.6 percent of renter households.

**Table D-19: Lack of Complete Facilities By Tenure in LA County**

Facility Type	Owner-Occupied	Renter-Occupied	Total Households
Lacking complete kitchen facilities	0.4%	2.6%	1.6%
Lacking complete plumbing facilities	0.3%	0.6%	0.5%
<b>Total Households</b>	1,534,472	1,798,032	3,332,504

Source: 2016-2020 ACS, Tables B25049 and B25053

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. According to the 2016-2020 ACS data, 85 percent of the housing stock in the County was built prior to 1990, including 59 percent built prior to 1970.

### Local Trend

In general, the condition of the housing stock in Commerce is good. None of the owner-occupied units in the City have substandard conditions (lacking plumbing and/or kitchen facilities) and less than one percent of renter-occupied units lack complete kitchen facilities (Table D-20). The substandard conditions in Commerce are lower than Los Angeles County.

**Table D-20: Lack of Complete Facilities By Tenure in Commerce**

Facility Type	Owner-Occupied	Renter-Occupied	Total Households
Lacking complete kitchen facilities	0.0%	0.9%	0.4%
Lacking complete plumbing facilities	0.0%	0.0%	0.0%
<b>Total Households</b>	1,933	1,570	3,503

Source: 2016-2020 ACS, Tables B25049 and B25053

Table D-21 shows the overall age of the housing stock in Commerce. Approximately 86 percent of the housing units in the City are 30 years or older, which is consistent with the County overall (85 percent). Approximately 65 percent of Commerce’s housing stock is 50 years or older, which is slightly higher than the County (59 percent).

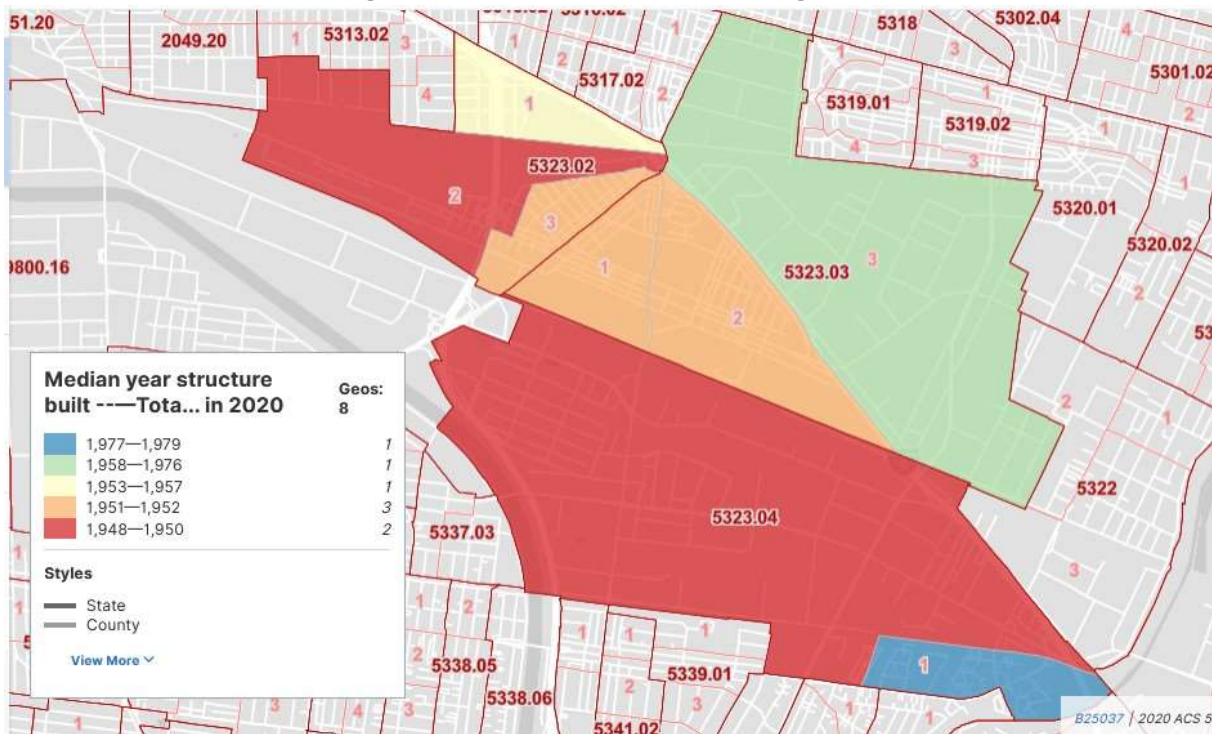
**Table D-21: Housing Unit Age**

Block Group	1969 or Earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or Later (<30 Years)	Total Housing Units
Block Group 1, Census Tract 5323.02	60.8%	4.9%	34.3%	329
Block Group 2, Census Tract 5323.02	88.6%	0.0%	11.4%	245
Block Group 3, Census Tract 5323.02	85.0%	3.7%	11.2%	641
Block Group 1, Census Tract 5323.03	98.5%	1.5%	0.0%	328
Block Group 2, Census Tract 5323.03	79.4%	16.7%	3.8%	754
Block Group 3, Census Tract 5323.03	22.6%	48.4%	29.0%	221
Block Group 1, Census Tract 5323.04	29.8%	49.7%	20.5%	887
Block Group 2, Census Tract 5323.04	79.5%	17.1%	3.4%	205
City of Commerce	65.4%	20.9%	13.7%	3,610

Source: 2016-2020 ACS, Table B25034

Table D-21 and Figure D-39 show that the block group on the east side of Interstate 5 and the block group in the southeastern corner of the City have a higher percentage of newer housing (30 years or newer) than the rest of Commerce.

**Figure D-39: Median Year Housing Built**



Source: 2016-2020 ACS

Overcrowding is an important housing issue for the City to monitor as overcrowded households can lead to neighborhood deterioration due to the intensive use of individual housing units leading to excessive wear and tear, and the potential cumulative overburdening of community infrastructure and service capacity.

As discussed above, the percentage of overcrowded households in Commerce decreased from 2010 to 2020. However, nineteen percent of renter households and 13 percent of owner households still face overcrowding. Severe overcrowding impacts eight percent of renter households and one percent of owner households in the City.

Geographically, comparing Figure D-38 with Figure D-39, the area of the City between the railroad tracks and the I-5 freeway has a high percentage of overcrowded households and a median year of 1951/52 when homes were built. These two factors may contribute to substandard housing conditions in the Rosini, The Village and Rosewood neighborhoods.

The City's rehab program is implemented on a first-come, first-serve basis. A majority of rehab projects take place in the Rosewood neighborhood due to the neighborhood residents being more aware of City programs.

## **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 C-43 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. There are fewer vulnerable communities in coastal areas from Rolling Hills to Malibu.

### Local Trend

As shown on Figure D-40, Commerce is identified as a sensitive community. Several of the communities surrounding Commerce are also at risk of displacement. The following includes the list of criteria for vulnerable communities that apply to Commerce:

- The share of very low-income residents is above 20 percent: *According to the 2019 HUD Comprehensive Housing Affordability Strategy (CHAS) Data, approximately 52 percent of Commerce residents are considered extremely low or very low income (<50% AMI); and*

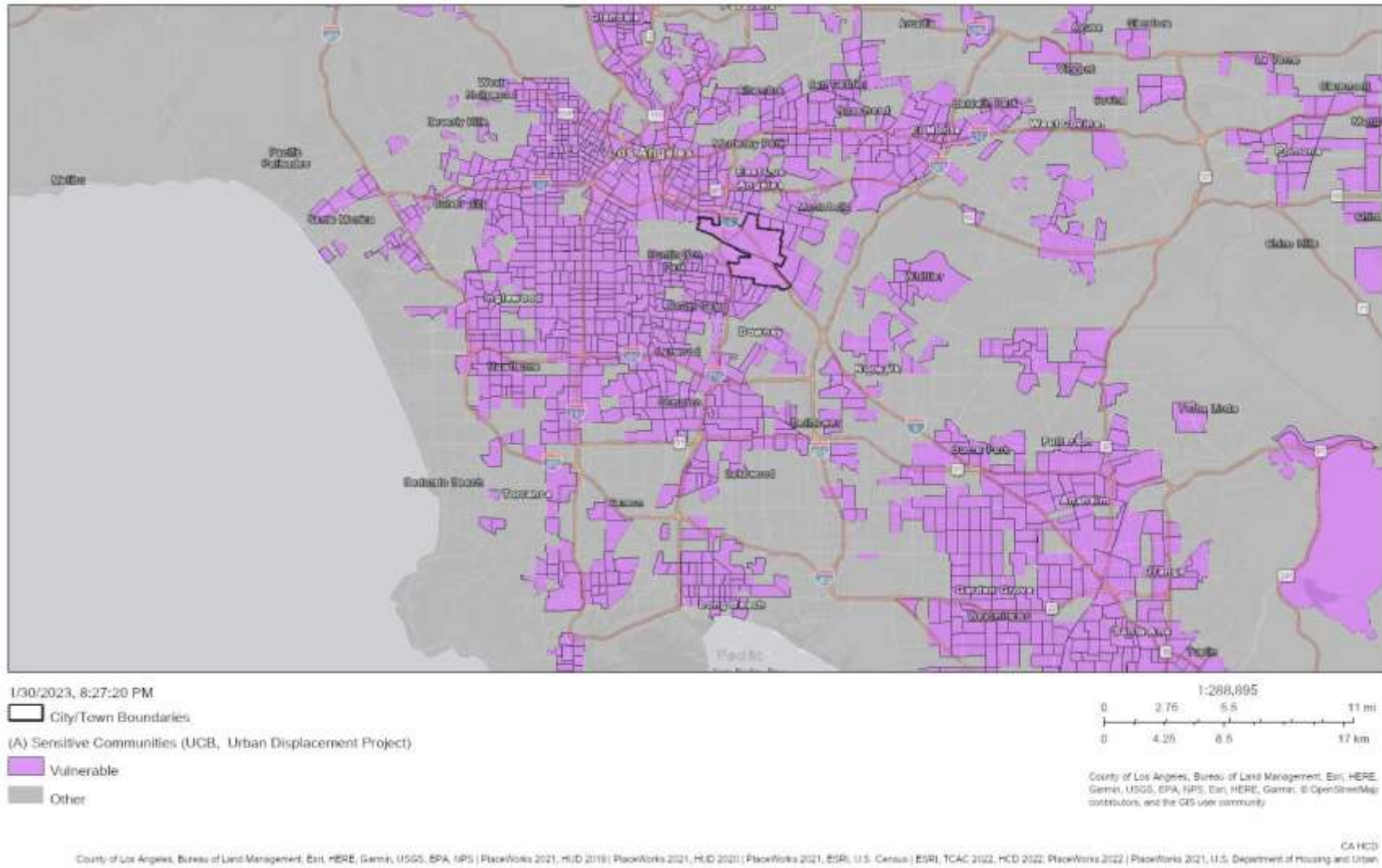
The tract meets two of the following criteria:

- Share of renters is above 40 percent: *Figure D-41Figure D-41 shows that a majority of Commerce households are renter households. The northern portion of the City has over 50 percent renter households while the southern portion has approximately 65 percent.*
- Share of people of color is above 50 percent: *As seen in Table D-1Table D-1, 95 percent of Commerce residents are Hispanic or Latino.*
- Share of very low-income households that are severely rent burdened households is above the county median.: *This does not apply to Commerce. The 2019 CHAS data shows that the percentage of severely cost burdened renters is nine percent in Commerce compared to 30 percent in Los Angeles County.*
- The area or areas in close proximity have recently experienced displacement pressures (percent change in rent above County median for rent increases): *This does not apply to Commerce, as median rents in Commerce had a lower percent increase (24 percent) than the County overall (37 percent) between 2010 and 2021.*
- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap): *This does not apply to Commerce as seen in Figure D-42Figure D-42. Commerce rents are equal to or lower than many neighboring tracts.*

While Commerce is a sensitive community, the factors described above shows that it at a lower risk of displacement due to lower rents and less cost burden than the County overall. Figure D- 43 shows the displacement risk of Commerce and surrounding areas. Commerce is listed as “lower risk”, particularly when compared to surrounding jurisdictions.



Figure D-40: Regional Sensitive Communities At Risk of Displacement



Source: HCD AFFH Data Viewer (2018), 2022

**Figure D-41: Percent of Renter Households in Commerce**



Source: HCD AFFH Data Viewer (2018), 2022

**Figure D-42: Median Gross Rent**



Source: HCD AFFH Data Viewer (2018), 2022



**Figure D- 43: Displacement Risk in Commerce and Surrounding Areas**

## Homelessness

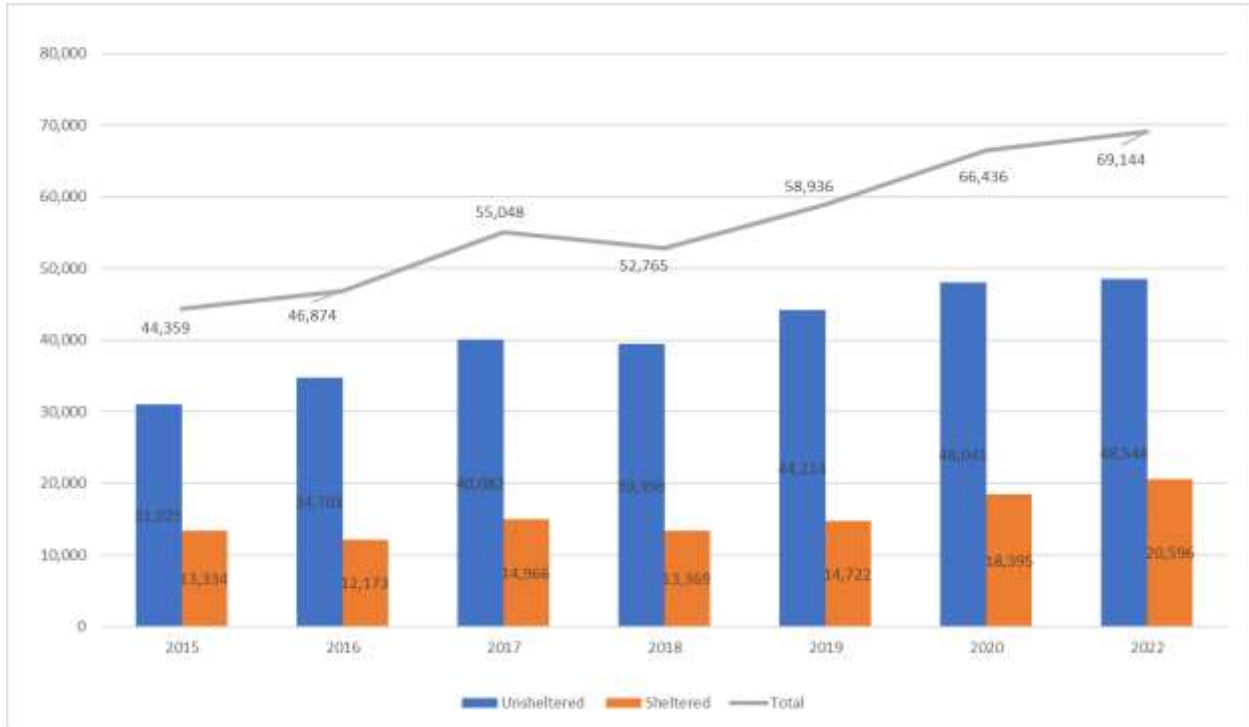
### Regional Trend

The Los Angeles Homeless Services Authority (LAHSA) estimates there were 69,144 persons experiencing homelessness in the Los Angeles County in 2022.<sup>4</sup> The Point-in-Time (PIT) count was conducted February 2022 and the data was released in September 2022.<sup>5</sup> [Figure D-44](#)[Figure D-43](#) shows the trends in Los Angeles County of unsheltered and sheltered individuals from 2015 to 2022. It should be noted that no count was conducted in 2021 due to the Covid pandemic. While there was an increase of approximately 2,708 persons experiencing homelessness between 2020 and 2022, the increase in unsheltered persons was only about 500. This was due to an increase in shelter beds in the County over the two-year period.

<sup>4</sup> While the LAHSA has released data from the 2023 PIT Count, at the time of this report writing, the information is only at the County and SPA levels and does not include information at the City level. Therefore, the 2022 information was used instead to provide a consistent picture for LA County and the City of Commerce.

<sup>5</sup> LAHSA, 2022 Greater Los Angeles Homeless County Slide Deck, September 8, 2022. [www.lahsa.org](http://www.lahsa.org)

**Figure D-4443: Los Angeles County Homeless Population Trend (2015-2022)\***



\*No Point-in-Time Count was conducted in 2021 due to the Covid pandemic

Source: Los Angeles Homeless Services Authority (LAHSA), 2015-2020, 2022 LA County/LA Continuum of Care (CoC) Homeless Counts

Table D-22 shows the homeless populations in 2020 and 2022 by population type, gender, and health/disability. The largest increases in subpopulation groups were unaccompanied minors (increase of 64 percent), persons who identified as non-binary/gender non-conforming (increase of 278 percent) and persons with substance abuse disorders (110 percent). Subpopulations that saw a decrease between 2020 and 2022 were transitional aged youth (decrease of 52 percent) and persons identifying as transgender (decrease of 36 percent).

**Table D-22: Los Angeles County Homeless Population Demographics (2020, 2022)\***

	2020		2022		Percent Change
	Persons	Percent	Persons	Percent	
<b>Total</b>	<b>66,436</b>	<b>100%</b>	<b>69,144</b>	<b>100%</b>	<b>4%</b>
Individuals	53,619	81%	58,251	84%	9%
Transitional Aged Youth (18-24)	4,278	6%	2,067	3%	-52%
Unaccompanied Minors (under 18)	74	<1%	121	<1%	64%
Family Members**	12,817	19%	10,893	16%	-15%
Veterans	3,902	6%	3,942	<1%	1%
People Experiencing Chronic Homelessness	25,490	38%	28,576	41%	12%
Fleeing Domestic/Intimate Partner Violence	4,356	7%	4,750	8%	9%
<b>Gender</b>					
Male	39,348	67%	46,016	67%	17%
Female	18,331	31%	22,294	32%	22%
Non-Binary/Gender Non-Conforming	200	<1%	755	1%	278%
Transgender	1,057	2%	678	1%	-36%
<b>Health and Disability***</b>					
Substance Use Disorder	7,836	13.3%	16,431	26%	110%
HIV/AIDS	1,306	2.2%	1,478	2%	13%
Serious Mental Illness	13,670	23.2%	15,499	25%	13%

\*No Point-in-Time Count was conducted in 2021 due to the Covid pandemic

\*\*Members of families with at least one child under 18.

\*\*\* Indicators are not mutually exclusive.

Source: Los Angeles Homeless Services Authority (LAHSA), 2020 and 2022 LA County/LA Continuum of Care (CoC) Homeless Counts.

The following data 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. Table D-23 shows the race and ethnicity of the County's homeless population in 2022 as well as the percentage in the County's overall population. Approximately 45 percent of the homeless population in 2022 were Hispanic or Latino. This group makes up one-half of the County's population overall. A disproportionate percentage of persons experiencing homelessness were Black or African American individuals. They represented 30 percent of the homeless population while only making up about nine percent of the County's population overall. Conversely, Asian residents comprise about 16 percent of the County, but less than one percent of the homeless population in 2022.

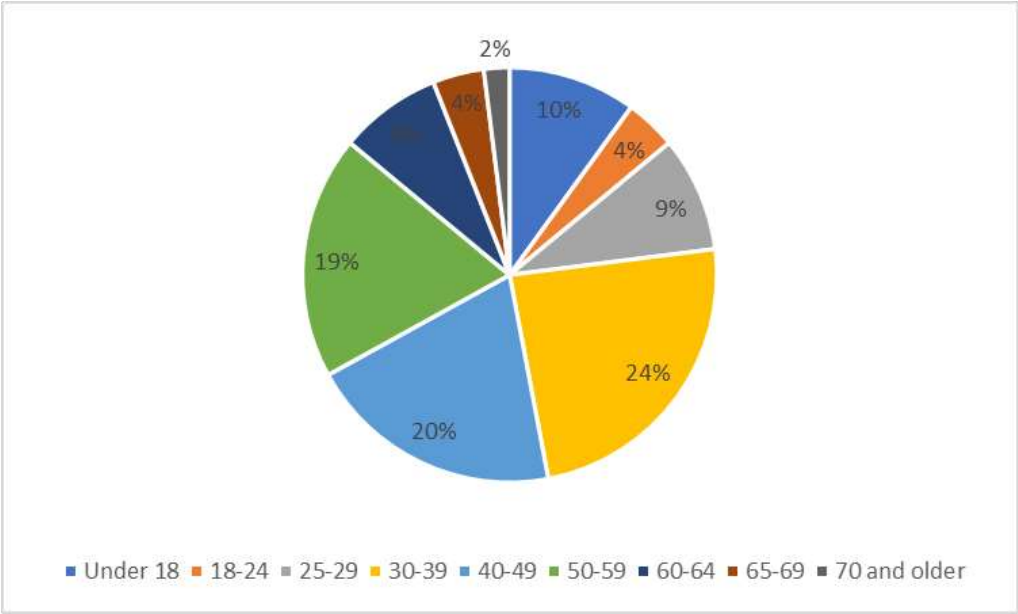
**Table D-23: Race and Ethnicity of LA County CoC Homeless Population (2022)**

Race / Ethnicity	Total Homeless Pop.	Prevalence in Homeless Pop. (%)	Prevalence in LA County Pop. (%)*
Hispanic/Latino	28,940	44.5%	49.1%
Black/African American (Non-Hispanic/Latino)	19,523	30.0%	9.0%
White (Non-Hispanic/Latino)	13,661	21.0%	25.3%
Mixed or Multiple races (Non-Hispanic/Latino)	1,637	2.5%	3.3%
Asian (Non-Hispanic/Latino)	598	0.9%	15.6%
American Indian/Alaska Native (Non-Hispanic/Latino)	610	0.9%	1.5%
Native Hawaiian/Other Pacific Islander (Non-Hispanic/Latino)	142	0.2%	0.4%
<b>Total</b>	<b>65,111</b>	<b>100%</b>	<b>-</b>

Source: Los Angeles Homeless Services Authority (LAHSA), 2022 LA County/LA Continuum of Care (CoC) Homeless Counts

Figure D-45 shows the percentage of homeless persons by age in 2022. The largest percentage were persons age 30 to 39 (24 percent) while the lowest were persons age 70 or older (2 percent). Children (age 18 and younger) accounted for ten percent of the homeless population.

**Figure D-45: Los Angeles CoC Homeless Population by Age**



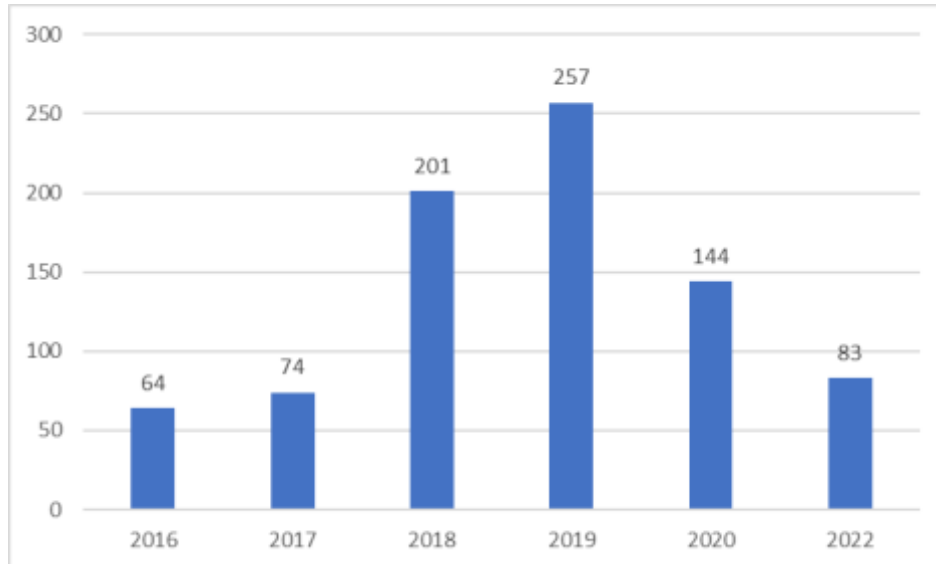
Source: Los Angeles Homeless Services Authority (LAHSA), 2022 LA County/LA Continuum of Care (CoC) Homeless Counts.

**Local Trend**

Los Angeles County is divided into Service Planning Areas (SPAs) and Commerce is located in SPA 7.

Figure D-46 and Table D-24 show the results from the 2022 PIT Count for the City. A total of 83 unsheltered persons were counted in Commerce. This number is lower than in the past few years, with the unsheltered homeless population peaking at 257 persons in 2019 (Figure 2-5). Of the unsheltered persons in 2022, over half (55 percent) were in some type of vehicle, such as cars, vans or RVs. Persons in makeshift shelters comprised 30 percent of those counted.

**Figure D-4645: Unsheltered Persons in Commerce (2016-2020, 2022)\***



\*No Point-in-Time Count was conducted in 2021 due to the Covid pandemic  
 Source: Los Angeles Homeless Services Authority (LAHSA),  
 2022 LA County/LA Continuum of Care (CoC) Homeless Counts.

**Table D-24: Unsheltered Persons in Commerce - 2022**

	Number	Percent
Cars	10	12.0%
Vans	5	6.0%
RVs	32	38.6%
Tents	4	4.8%
Makeshift Shelters	25	30.1%
On the Street	7	8.4%
Total	83	100.0%

Source: Los Angeles Homeless Services Authority (LAHSA),  
 2022 LA County/LA Continuum of Care (CoC) Homeless Counts

As described in the latest PIT count above, more than half of people were in some type of vehicle. Since Commerce is an industrial City, it is easier for vehicles to park in undisclosed places. City staff stated that the majority of the homeless stay within the City's industrial areas. They typically congregate in rail spurs, freeway underpasses, embankments and vacant lots throughout the City.

In Commerce, the Homeless, Engagement And Referral Team (HEART) consists of Code Enforcement, Social Services, Public Works, Sheriff's Department and Public Safety employees. The HEART members go out on responses to calls regarding persons experiencing homelessness living in their vehicles or other locations in the City. The team provides information about nearby services and resources. The team will return a few days later to check in and see what else may be needed. If there is a violation of a local ordinance, the team will post a 72-hour notice.

A variety of social service agencies are available to assist persons experiencing homelessness. All of the information is available to residents through the City's service counter at the Recreation Department. One agency, Helpline Youth Counseling, has an office within the City limits. Headquartered in Whittier, this organization works with families and youth and provides counseling as well as homeless and housing support services. A 24/7 helpline is available along with walk-in hours during the week.

To conform with State law (AB 2339), the City will amend the Zoning Code to allow emergency shelters by right in the new Mixed Use or Mixed Use/Atlantic designations where multi-family, mixed use, and live/work housing, among other housing types are permitted. There is sufficient land capacity to accommodate the City's homeless should shelters be proposed. Several transit lines run along or adjacent to Atlantic Boulevard, providing public transportation opportunities and access to services and facilities, including the Metro Bus Line 260 and the Commerce Transit Center. The Commerce Public Library is also located on Atlantic Boulevard.

This Housing Element also includes programs to update/modify standards for Supportive and Transitional Housing as well as Single Room Occupancy units.

## Other Relevant Factors

### Historical Trends and Land Use Development

Incorporated in 1960, the City is located six miles east of downtown Los Angeles and bordered by Bell, Bell Gardens, Downey, East Los Angeles (unincorporated County), Montebello and Vernon. The City is primarily made up of industrial uses (more than 60 percent of Commerce's total land area is industrial). The City's proximity to railways and major freeways such as the I-710, and I-5 allows for easy and convenient connections to Downtown Los Angeles, industrial and commercial districts, and the ports of Long Beach.

A major challenge for the City since its incorporation has been the coexistence of industry near and among the area's existing residential neighborhoods.

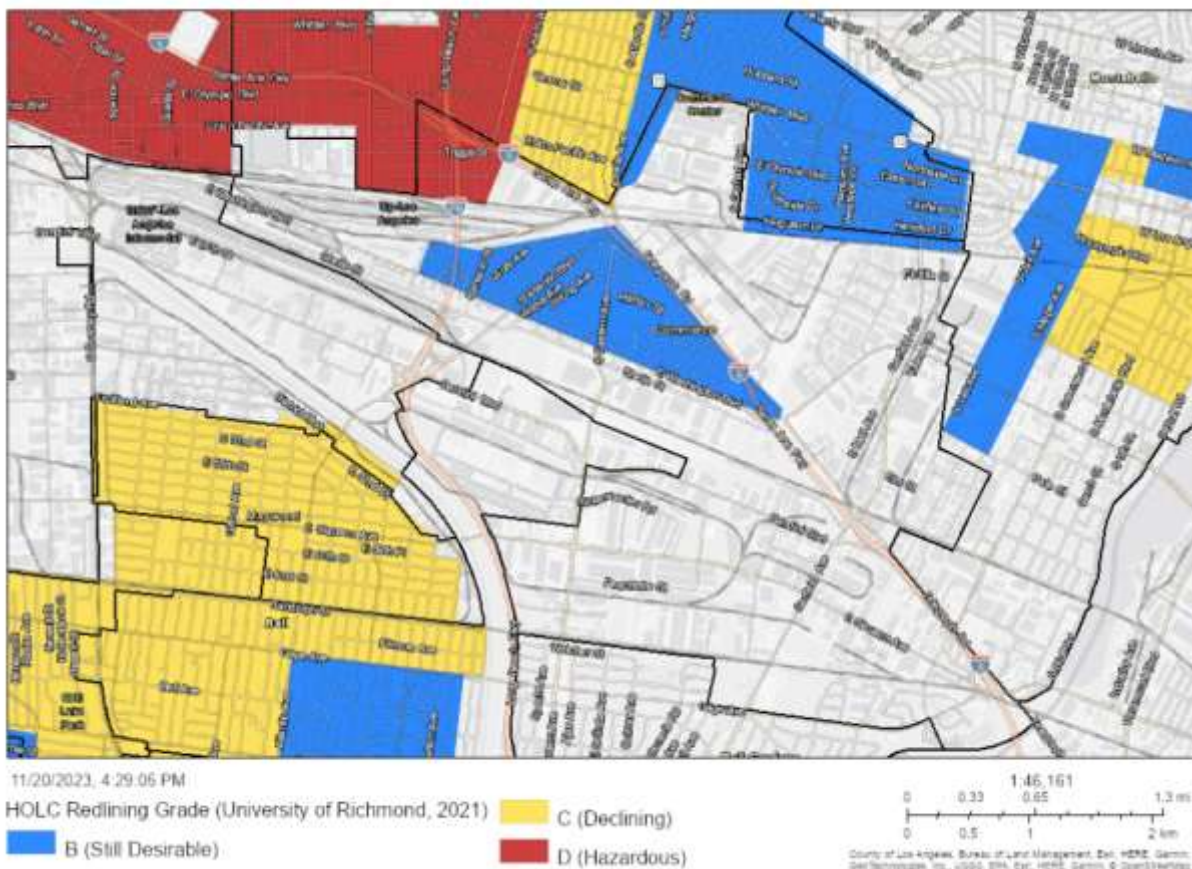
Many of the original housing units constructed in the City were developed in the 1960s as work force housing for employees working at the various companies located in the City. Developed as separate communities, identified with specific names, residential areas in Commerce are islands surrounded on at least two sides by commercial and industrial uses creating a unique set of issues and opportunities. Following the City's incorporation,



the Commerce Community Development Commission was very active in its efforts to implement a residential relocation program to move households from older industrial districts to newer residential neighborhoods. Through these efforts, the Commission was able to relocate residents living in older households in the midst of industrial areas to homes in newly established residential neighborhoods. The older, often substandard units were then demolished and the land was then used for industrial expansion. Over time, these and similar programs have eliminated many of the land use conflicts in the City.

Figure D-47 shows the Redline map for Commerce and the surrounding areas. Two areas were shown in Commerce: (1) area between I-5 and Washington Boulevard that was still considered desirable (blue) and (2) northern corner of the City that was part of an East Los Angeles neighborhood considered hazardous (red).

**Figure D-47: Redlining in Commerce and Surrounding Areas**



The general nature and location of land uses has changed very little since the City incorporated. Over the years has maintained much of its manufacturing and distribution land uses while expanding into commercial. As such, Commerce was, and remains, predominantly industrial, providing employment for tens of thousands of persons living throughout the Los Angeles region. Figure D-48 shows the current zoning map, with much of the land in the City zoned for heavy industrial and commercial manufacturing

land uses. The City has been a pro-business environment with no municipal property tax and no utility tax.

The City has developed many amenities for its residents, including Rosewood Park (with an Aquatorium), four municipal libraries, Veterans Park Stadium and the nation's first free municipal transportation system. The City is planning for successful and attractive residential development that will not be impacted by the existing industrial's past. Instead we hope to plan residential areas that will decrease commuting and increase housing near major job/work locations.

### **Demographics and Household Income**

The City of Commerce is a unique industrial city with a strong sense of community among its residents. This is due to the development patterns which includes established neighborhoods that are located throughout the city. As described in the Housing Needs chapter of this Element, approximately 95 percent of Commerce residents are Hispanic, the median age is 37.5 years (ten years more than in 2010) and 76 percent of households are families. Seniors make up 18 percent of the population while disabled residents, many whom are veterans, comprise 13 percent of the City's residents. In terms of income, over three-fourths of households in Commerce are lower income. Female-headed households are the household type that face the greatest economic challenges in Commerce. In 2020, while female headed-households in poverty comprised three percent of all Commerce households, they represented over 60 percent of the 537 Commerce households living below the poverty line.

The City has a variety of commissions to support its residents, as well as many social services programs run through the library. These include:

- The City's Commission on Disabilities Access and Opportunity is a five-person commission that advises the City Council regarding concerns or issues affecting people with special needs, including those with physical and mental disabilities. The Commission meets once a month. Agenda items include City recreation programs for disabled residents, library programs and awareness support.
- The City's Senior Citizens Commission meets the first Wednesday of each month to formulate policies and recommendations for submission to the City Council with respect to senior programs available to residents. The City of Commerce's Senior Center offers a variety of programs for Commerce residents age 50 and older.
- The City's Parks and Recreation Department offers a variety of youth programs at its four community parks and associated community centers. These include preschool programs as well as children programs and youth sports. The Brenda Villa Aquatic Center has swimming facilities for youth.
- The City's Teen Center offers a variety of programs and support for teens living in Commerce. Programs include exercise, arts and crafts, cooking, drawing, painting,

performing arts, tournaments, dances and excursions. The Center includes internet access, pool tables, video games and other amenities.

- Commerce has a Youth Advisory Commission that advises the City Council on all matters pertaining to youth in the city.

## Home Loans

Home loan activity in Commerce during 2021 is available through the Consumer Financial Protection Bureau’s (CFPB) Home Mortgage Disclosure Act (HMDA). Table D-25 shows the total number of applications by loan type as well as the approval and denial rates. Out of the 315 loan applications in 2021, 242 (77 percent) were for refinance loans, 51 (16 percent) were for conventional purchase loans, 18 (6 percent) were for government-backed purchase loans and four (1 percent) were for home improvement loans. The overall loan approval rate in the City was 62 percent. Conventional purchase loans had the highest approval rating at 69 percent while only one-half of home improvement loans were approved. Home improvement loans had the highest denial rate, at 50 percent. At least 20 percent of the home purchase and refinance loan applications were either withdrawn by the applicant or closed for incompleteness.

**Table D-25: Disposition of Home Loan Applications in Commerce (2021)**

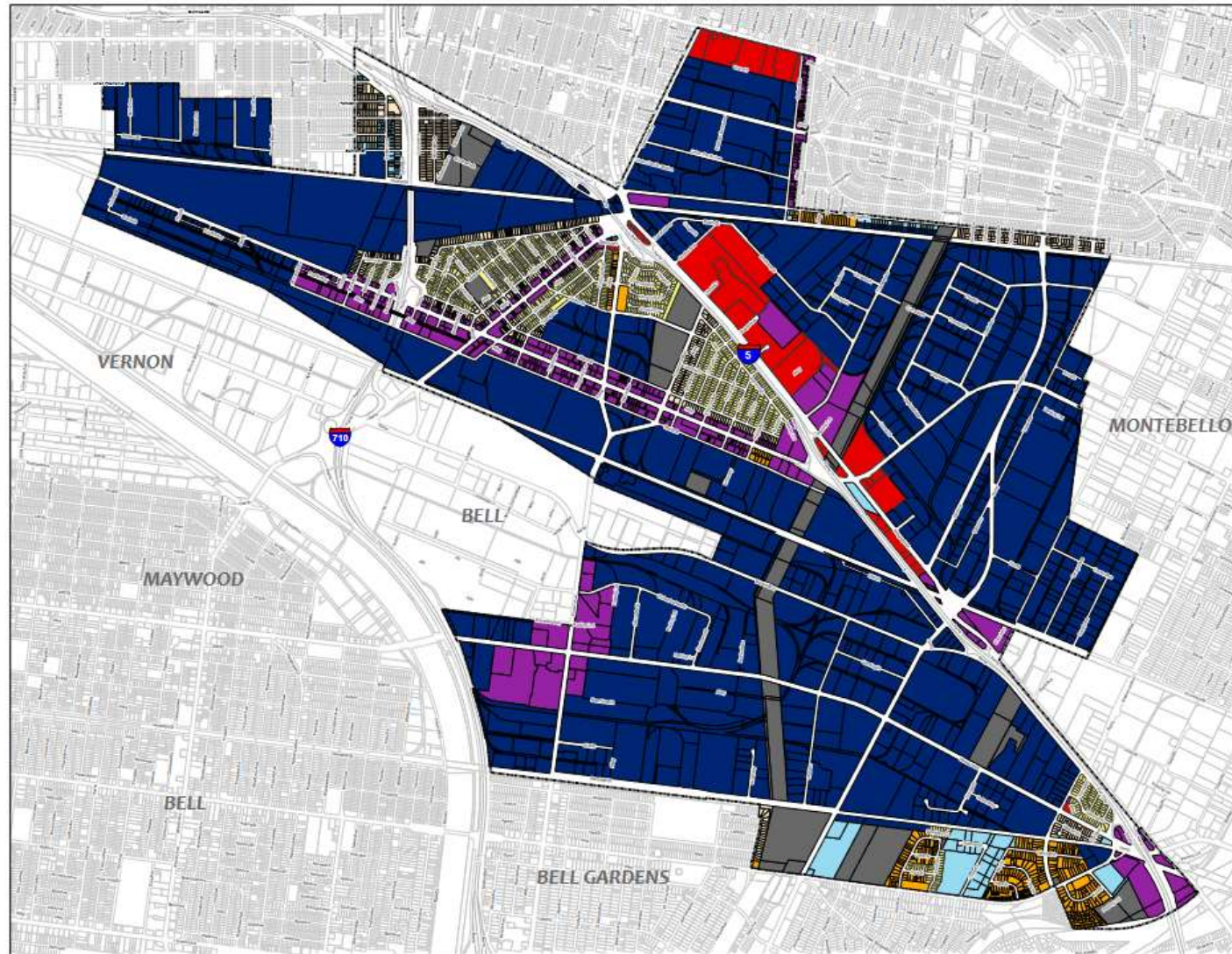
Loan Type	Total Applications	Approved	Denied	Other
Conventional Purchase	51	68.6%	9.8%	21.6%
Government-Backed Purchase	18	61.1%	11.1%	27.8%
Refinance	242	60.7%	14.5%	24.8%
Home Improvement	4	50.0%	50.0%	0.0%
Total	315	61.9%	14.0%	24.1%

Source: 2021 Home Mortgage Disclosure Data: <https://ffiec.cfpb.gov>

Note: “Approved” loans include loans originated and applications approved but not accepted. “Other” includes loans withdrawn by the applicant or closed for incompleteness.



Figure D-4846: City of Commerce Zoning Map



**ZONING MAP**  
City of Commerce, CA

**ZONING**

- R1- Single Family Residential
- R2- Light Multiple Residential
- R3- Medium Multiple Residential
- C2- Unlimited Commercial
- C/M1- Commercial Manufacturir
- M1-Light Manufacturing
- M2- Heavy Industrial
- PF- Public Facility

**Revisions**

Description	Date

ISSUED:  
 Description: Sanction Census Data Changes from 2010 to 2020  
 Date: 10/20/23  
This map is provided for general information. The user also provided on this map represents the data available and does not constitute a warranty or representation of any kind. The user is responsible for the accuracy of the data and for the use of the data. The user is not responsible for any errors or omissions in this map. The user is not responsible for any damages or losses resulting from the use of this map. This map is provided by the City of Commerce Department of Public Works Development Services.

0 1,000 2,000 Feet

Source: City of Commerce, 2023

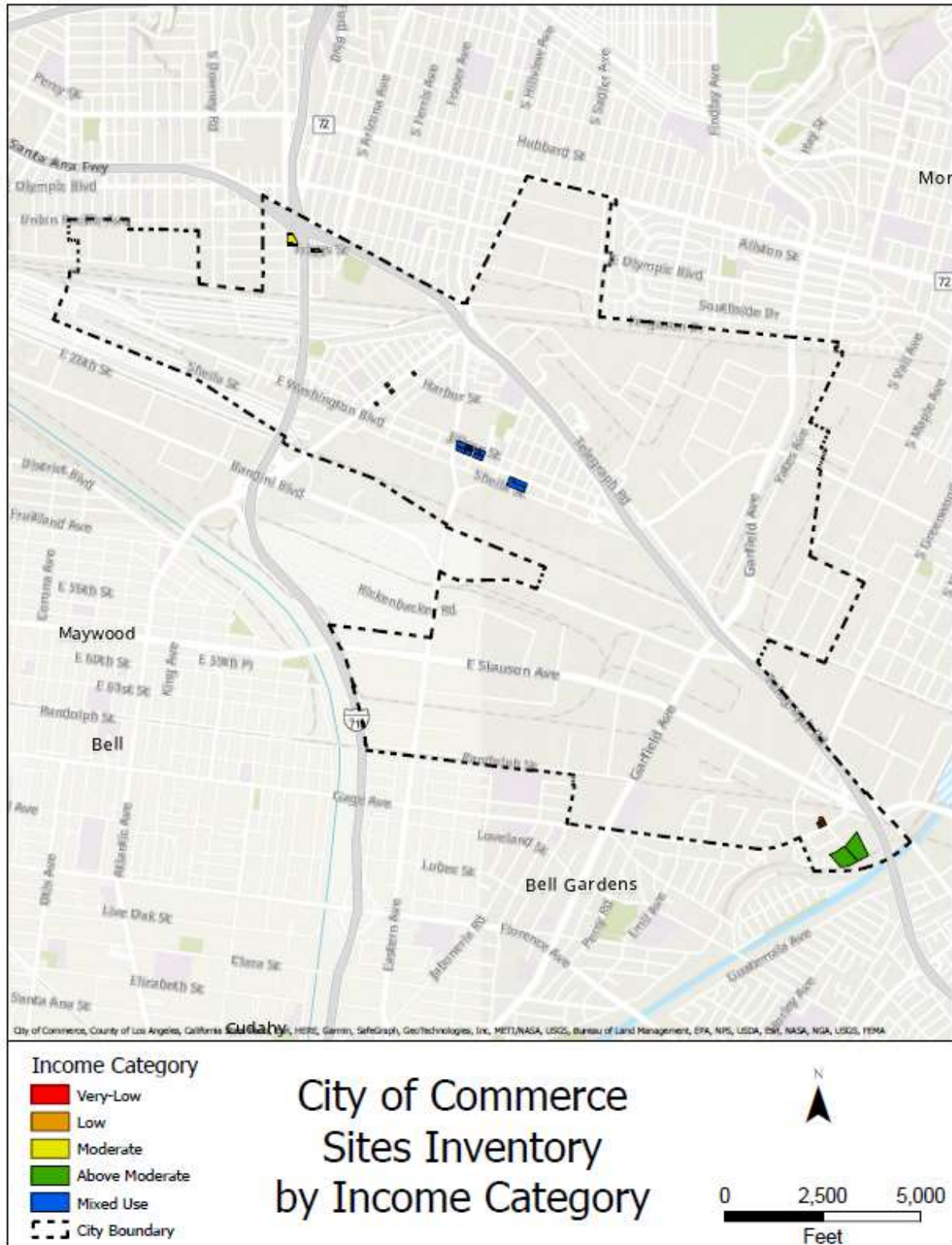
## Sites Inventory

Throughout this AFFH chapter, a sites inventory analysis was provided regarding Segregation and Integration, Environmental Conditions and Housing Problems. [Figure D-49](#) ~~Figure D-47~~ shows the sites by income category. Very low and low income sites are located in the southeast corner of the city, moderate income sites are in the northwest, above moderate sites are in the northwest, central and southeast areas and mixed income sites (a combination of low, moderate and/or above moderate) are in the central portion of Commerce.

Table D-26 summarizes information about the number of sites inventory units and AFFH variables for the three census tracts in the City. The following section provides a detailed discussion of how the AFFH variables relate to the sites inventory for each census tract.



Figure D-4947: Commerce Site Inventory By Income Category





**Table D-26: Distribution of RHNA Units By Census Tract and AFFH Variable**

Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			Non-White Pop.	LMI HH Pop.	TCAC Opp. Cat.	R/ECAP?	RCAA?	Overcrowded HH	Cost Burdened Renters	Renter Pop.
			Lower	Moderate	Above Moderate								
5323.02	1,168	32	0	17	15	96.5-98.6%	68.4-83.5%	Low	No	No	15.7%	45.3%	30.4%%
5323.03	1,303	324	143	79	102	96.8-98.6%	49.0-67.1%	Low	No	No	20.6%	68.6%	45.6%
5323.04	1,032	862	12	0	850	96.6%	60.9%	Low	No	No	10.1%	29.5%	54.0%
<b>Total</b>		<b>1,218</b>	<b>155</b>	<b>96</b>	<b>967</b>								

**Census Tract 5323.02**

Census Tract 5323.02 includes the portion of Commerce west of Atlantic Boulevard. A total of 32 moderate and above moderate units are allocated to this tract. Most of the proposed sites are located in the Northwest and Bristow residential neighborhoods and currently zoned for medium and high density residential. A few sites are located on the west side of Atlantic Boulevard in the current Atlantic Mixed Use General Plan land use designation. This tract has the highest percentage of low and moderate income households in Commerce (68 to 84 percent) and lowest percentage of renter households (30 percent). However, 45 percent of renters are cost burdened. Sites in these locations have a density of 12 dwelling units per acre. During the public outreach for the General Plan Update, the Northwest and Bristow areas were identified as locations to have additional residential uses over time (GPAC Meeting #10, 11/2019). In addition, mixed use land use designations, including along Atlantic Boulevard, are integral parts of the General Plan Update. A variety of housing options were identified as a priority in the public outreach since 2018.

**Census Tract 5323.03**

Census Tract 5323.03 is located in central Commerce, bound by Atlantic Boulevard to the west, the railroad to the south and the city boundaries to the north and east. This tract has 49 to 67 percent low and moderate income households, the highest overcrowding rate in the City (21 percent) and almost half of the households are renters (46 percent). Of the renter households, 69 percent face cost burden issues. The sites in this tract accommodate 324 units of mixed incomes (143 lower, 79 moderate and 102 above moderate income). The sites are located along the eastern side of Atlantic Boulevard as well as along Jillson Street, Sheila Street and Washington Boulevard in the central portion of the City. The proposed sites are located in areas that will be designated for mixed land uses in the General Plan Update, providing for a variety of housing types for all income levels. The sites along Jillson are just south of the Housing Opportunity Overlay (HOO) and the Rosewood Village projects. These locations will assist in adding housing near the Commerce Transportation Center, City Hall, Library, and Rosewood Park and build walkable residential areas that were identified as important during the General Plan Update public outreach. Denser residential development was also seen as a priority during the public outreach process to provide different housing options.

**Census Tract 5323.04**

Census Tract 5323.04 is located in the southern part of the City with the railroad tracks serving as the northern boundary. In this tract, 61 percent of households are low or moderate income. The tract has the lowest percentage of overcrowded households in the City (10 percent), highest percentage of renter households (54 percent) and lowest percentage of renter cost burden (30 percent). The proposed sites can accommodate a total of 862 units. Of these, 850 are part of the approved Modelo Specific Plan in Veteran's Park. For the purpose of the RHNA, these units are assigned to above moderate income;

however, the development agreement commits the project to provide 10 percent (85 units) in the Specific Plan as workforce housing, affordable to middle income households (up to 175 percent AMI). The remaining proposed sites can accommodate 12 lower income units and are located along Gage Avenue adjacent to commercial and residential uses.

## Summary of Fair Housing Issues

### Fair Housing Enforcement and Outreach

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. According to the HCD AFFH Data Viewer, there have been only two FHEO inquiries in Commerce since 2013. Both were unrelated to a specific basis of discrimination and one was found to have no valid issue.

### Issue #1: Insufficient Fair Housing Testing and Limited Outreach Capacity (Medium Priority)

Currently, fair housing resources and services are not available on the City's website. Outreach to Commerce's residents can provide needed guidance for those facing fair housing issues in the City. In addition, despite outreach efforts, participation on outreach events is low. As described above, a majority of fair housing cases were related to disability (66 percent). Given that approximately 30 percent of seniors in Commerce, age 65 or older, have a disability, outreach to this group about fair housing is important.

#### Contributing Factors:

- Lack of fair housing testing and monitoring
- Lack of awareness of services
- Lack of a variety of media inputs

### Segregation and Integration and Access to Opportunities

### Issue #2: Patterns of Concentration and Disparate Economic Access to Opportunities/Resources (High Priority)

Overall, the City has a lower median income (\$54,639) than the County overall. Commerce also has Low TCAC composite scores in all census tracts. However, certain portions of the City face additional economic challenges:

- The northwest block group (west of Atlantic Boulevard) and the block group northeast of the Santa Ana (I-5) freeway has the highest concentration (75 to 100 percent) of low and moderate income households;

- The northwest and southern tracts have the lowest economic TCAC scores; and
- The southern tract has the highest poverty rate (20 to 40 percent) in the City.

***Contributing Factors:***

- Lack of access to quality schools
- Location and type of affordable housing
- Low median incomes

**Issue #3: Citywide Environmental Conditions (High Priority)**

As seen in Figure D-28, all of Commerce has the least positive TCAC Opportunity Map environmental scores (<0.25). In addition, the CalEnviroScreen 4.0 scores released in February 2020 (Figure D-29) show that all tracts in Commerce have the highest (worst) scores.

***Contributing Factors:***

- City's location in Los Angeles County (freeway and truck traffic); and
- Industrial and commercial manufacturing land uses within Commerce and adjacent cities.

**Disproportionate Housing Needs**

**Issue #4: High Concentrations of Aging Housing Stock, Cost Burden, and Overcrowding (Medium Priority)**

Cost burden impacts between 20 percent to 80 percent of all households in Commerce. Households in the southern part of the city face the highest owner cost burden (60 percent to 80 percent), while households east of Atlantic Boulevard and north of the railroad face the highest renter cost burden (60 percent to 80 percent).

Approximately 16 percent of Commerce residents are living in overcrowded conditions. This is higher than the County (11 percent) and statewide average (8.2 percent). Nineteen percent of renter households in Commerce are overcrowded compared to 13 percent of owner households.

Approximately 86 percent of the housing units in the city are 30 years or older, which is consistent with the County overall (85 percent). Approximately 65 percent of Commerce's housing stock is 50 years or older, which is slightly higher than the County.

The area of the City east of Atlantic Boulevard and north of the railroad track has the highest concentrations of renter cost burden and overcrowding in the City.

***Contributing Factors:***

- High housing and rent prices
- Availability of affordable units in a range of sizes
- Age of housing stock