

Appendix A

Glossary

Appendix A: Glossary

This glossary is for ease of use of the Burbank Housing Element only; for full definitions related to the City of Burbank Municipal Code, please see Title 10. Zoning Regulations.

A. Abbreviations

ACS:	American Community Survey
ADA:	Americans with Disabilities Act
ADU:	Accessory Dwelling Unit
AFFH:	Affirmatively Furthering Fair Housing
AFH:	Assessment of Fair Housing
AI:	Analysis of Impediments to Fair Housing Choice
AMI:	Area Median (Household) Income
APN:	Assessors Parcel Number
BCP:	Burbank Center Plan
BHA:	Burbank Housing Authority
BHC	Burbank Housing Corporation
BMP:	Best Management Practices
CBC:	California Building Code
CDBG:	Community Development Block Grant
CEQA:	California Environmental Quality Act
CHAS:	Comprehensive Housing Affordability Strategy
CUP:	Conditional Use Permit
DDS:	California Department of Social Services
DOF:	California Department of Finance
ECOA:	Equal Credit Opportunity Act
EDD:	California Employment Development Department
EIR:	Environmental Impact Report
ELI:	Extremely Low Income
FAR:	Floor Area Ratio
FEMA:	Federal Emergency Management Agency
FEHA:	California Fair Employment and Housing Act
FHA:	Fair Housing Act
FPV:	Family Promise of the Verdugos
FSA:	Family Service Agency
GHG:	Greenhouse Gas
GSSP:	Golden State Specific Plan
HCD:	California Department of Housing and Community Development
HMDA:	Home Mortgage Disclosure Act

HOME: HOME Investment Partnership Program
HUD: U.S. Dept. of Housing and Urban Development
NDVets: New Directions for Veterans
NEHRP: National Earthquake Hazards Reduction Program
NPDES: National Pollutant Discharge Elimination System
RATP: Residential Acoustical Treatment Program
R/ECAP: Racial and Ethnic Characteristics/Concentrations
RHNA: Regional Housing Needs Allocation
RPZ: Runway Protection Zones
SCS: Sustainable Communities Strategy
SCAG: Southern California Association of Governments
SCPH: Southern California Presbyterian Homes
SERAF: Supplemental Educational Revenue Augmentation Funds
SRO: Single Room Occupancy
TCAC: California Tax Credit Allocation Committee
TOD: Transit Oriented Development
UBC: Uniform Building Code
UWMP: Urban Water Management Plan

B. Definitions

Accessory Dwelling Unit: An accessory dwelling unit (also known as second units or granny flats) is an attached or detached structure that provides independent living facilities for one or more persons and includes permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as a single-family dwelling unit.

Acreage: Gross acreage refers to the entire acreage of a site. Most communities calculate gross acreage to the centerline of proposed bounding streets and to the edge of the right-of-way of existing or dedicated streets. Net acreage refers to the portion of a site that can actually be built upon. Public or private road right-of-way, public open space, and flood ways are not included in the net acreage of a site.

Accessible Housing Unit: An accessible housing unit is designed and built to be usable to a person with physical disabilities.

Affirmatively Furthering Fair Housing (AFFH): This new legislation requires all housing elements due on or after January 1, 2021 contain an Assessment of Fair Housing to ensure that laws, policies, programs, and activities affirmatively further fair housing opportunities throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, and other characteristics protected by the California Fair Employment and Housing Act.

Affordable Unit: A dwelling unit within a housing development which will be reserved for, and restricted to, income qualified households at an affordable rent or is reserved for sale to an income qualified household at an affordable purchase price.

Area Median Income: As used in State of California housing law with respect to income eligibility limits established by HUD. The Area Median Income referred to in this Housing Element is that of Los Angeles County.

At Risk: Deed-restricted affordable housing projects at risk of converting to market rate.

Burbank Housing Corporation (BHC): A non-profit housing developer actively involved in the purchase and management of affordable housing in the community.

By-Right Development: By right means the local government's development review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.

California Department of Housing and Community Development (HCD): The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low- and moderate-income households. HCD is responsible for reviewing Housing Element's and determining whether they comply with State housing statutes.

California Environmental Quality Act (CEQA): A State law requiring State and local agencies to regulate activities with consideration for environmental protection.

Census: The official decennial enumeration of the population conducted by the federal government.

City Council: The City Council serves as the elected legislative and policy-making body of the City of Burbank, enacting all laws and directing any actions necessary to provide for the general welfare of the community through appropriate programs, services, and activities.

Community Development Block Grant (CDBG): A grant program administered by HUD on a formula basis for entitlement communities, such as the City of Burbank. This grant allots money to cities and counties for housing and community development activities, including public facilities and economic development.

Conditional Use Permit (CUP): Conditional Use Permits are required for uses which may be suitable only in specific locations in a zoning district, or which require special consideration in their design, operation or layout to ensure compatibility with surrounding uses.

Condominium: A condominium consists of an undivided interest in common in a portion of real property coupled with a separate interest in space called a unit, the boundaries of which are described on a recorded final map, parcel map, or condominium plan in sufficient detail to locate all boundaries thereof.

Condominium Conversion: The conversion of existing real estate and/or structures to separate, salable condominium units, regardless of present or prior use and whether substantial improvements have been made to such structures.

Density Bonus: An increase in the density (number of dwelling units allowed per acre or parcel), above that normally allowed by the applicable zoning district, in exchange for the provision of a stated percentage of affordable units.

Development Fees: City imposed fees to partially cover the costs for processing and providing services and facilities; and fund capital improvements related to fire, police, parks, and libraries and correlate the increased demands on these services.

Dissimilarity Index: A measure of residential segregation is the dissimilarity index, which is a commonly used measure of community-level segregation.

Dwelling Unit: Any building or portion thereof which contains living facilities, including provisions for sleeping, eating, cooking and sanitation, for not more than one family.

Emergency Shelter: An establishment operated by an Emergency Shelter Provider that provides homeless people with immediate, short-term housing for no more than six months in a 12-month period, where no person is denied occupancy because of inability to pay.

Environmental Impact Report (EIR): Required by CEQA, this document serves to inform governmental agencies and the public of a project's potential environmental impacts and provides mitigation measure if impacts are found to be significant.

Fair Market Rent: The rent, including utility allowances, determined by HUD for purposes of administering the Section 8 Housing Choice Voucher Program.

Family: A group of persons who maintain a single common household, but who otherwise are not a Community Care Facility.

General Plan: A statement of policies, including text and diagrams setting forth objectives, principles, standards, and plan proposals, for the future physical development of the city or county (see Government Code Sections 65300 et seq.). California State law requires that a General Plan include elements dealing with seven subjects—circulation, conservation, housing, land use, noise, open space and safety—and specifies to various degrees the information to be incorporated in each element.

Growth Management (Measure One): Approved by Burbank voters in 1989, prohibits the City from increasing the maximum allowed number of residential units beyond the approved maximum build out

in the 1988 Land Use Element without voter approval. The purpose of the ordinance is to coordinate the rate of residential growth with the availability of public facilities and services.

Homeless: Persons and families who lack a fixed, regular, and adequate nighttime residence. Includes those staying in temporary or emergency shelters or who are accommodated with friends or others with the understanding that shelter is being provided as a last resort. California Housing Element law requires all cities and counties to address the housing needs of the homeless.

Household: All persons living in a housing unit.

Householder: The head of a household.

Housing Element: One of the seven State-mandated elements of a local general plan, it assesses the existing and projected housing needs of all economic segments of the community, identifies potential sites adequate to provide the amount and kind of housing needed, and contains goals, policies, and implementation programs for the preservation, improvement, and development of housing.

Inclusionary Housing Ordinance: Adopted by the Burbank City Council in 2006, the City's ordinance requires developers of housing with five or more units to provide at least 15 percent of the units as affordable to very low, low and moderate income households, or to pay an in-lieu housing fee.

Infill Development: Development of land (usually individual lots or left-over properties) within areas that are already largely developed.

Infrastructure: Public services and facilities, such as sewage-disposal systems, water-supply systems, other utility systems, and roads.

In Lieu Fee: A fee paid to the City in-lieu of a development requirement, such as required inclusionary units.

Land Use Regulation: A term encompassing the regulation of land in general and often used to mean those regulations incorporated in the General Plan, as distinct from zoning regulations (which are more specific).

Lot or Parcel: A portion of land shown as a unit on a recorded subdivision map or an approved minor subdivision map, parcel map or otherwise existing as of record with the Los Angeles County Office of the Assessor.

Low Income Household: A household earning less than 80 percent of the Los Angeles County median income based on information provided by HCD/HUD.

Manufactured Housing/Mobile Home: A dwelling unit built in a factory in one or more sections, transported over the highways to a permanent occupancy site, and installed on the site either with or without a permanent foundation.

Mixed-use: The combination of various uses, such as office, retail and residential, in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design.

Moderate Income Household: A household earning 80% to 120% of the Los Angeles County median income based on information provided by HCD/HUD.

Multi-family Residential: Usually two or more dwelling units on a single site, which may be in the same or separate buildings.

Ordinance: A law or regulation set forth and adopted by a governmental authority, usually a city or county.

Overcrowding: Household living in a dwelling unit where there are more than 1.01 persons per room, excluding kitchens, porches and hallways. Severe overcrowding is where there are more than 1.51 persons per room.

Overpayment: Housing overpayment occurs when a household spends more than 30 percent of its income on housing costs; severe overpayment refers to spending greater than 50 percent of income on housing.

Persons with Disability: A person with a long lasting physical, mental, or emotional condition that impairs their mobility, ability to work, or ability for self-care.

Planning Board: The Burbank Planning Board conducts public hearings and makes decisions on applications for discretionary projects, considers appeals of decisions by the Community Development Director, and serves as the advisory body to the Burbank City Council on planning issues.

Poverty Level: As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or “poverty thresholds” varying by size of family, number of children, and age of householder.

Reasonable Accommodation: The federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use a dwelling.

Regional Housing Needs Allocation (RNHA): A quantification by SCAG and HCD of existing and projected housing need -- the City’s fair share of the regional housing needs by household income group.

Rezoning: An amendment to the map and/or text of a zoning ordinance to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

Section 8 Rental Assistance Program: A federal (HUD) rent-subsidy program that is one of the main sources of federal housing assistance for low income households. The program operates by providing “housing assistance payments” to owners, developers, and public housing agencies to make up the difference between the “Fair Market Rent” of a unit (set by HUD) and the household’s contribution toward the rent, which is calculated at 30 percent of the household’s adjusted gross monthly income.

Senior Housing Projects: Defined by California Housing Element law as projects developed for, and put to use as, housing for senior citizens. Senior citizens are defined as persons at least 62 years of age.

Single-family Residential: A single dwelling unit on a building site.

Specific Plan: A plan addressing land use distribution, open space availability, infrastructure, and infrastructure financing for a portion of the community. Specific plans put the provisions of the local general plan into action.

Special Needs Population: Under Housing Element statutes, special needs populations include the elderly, persons with disabilities, female-headed households, large households, and the homeless.

Supportive Housing: Permanent affordable housing with no limit on length of stay that is linked to on- or off-site 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 where possible, work in the community.

Transitional Housing: A dwelling unit or group of dwelling units for residents in immediate need of temporary housing. Transitional housing is configured as rental housing, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined time, which shall be no less than six months.

U.S. Department of Housing and Urban Development (HUD): A cabinet-level department of the federal government that administers housing and community development programs.

Vacant: Lands or buildings that are not actively used for any purpose.

Very Low Income Household: A household with an annual income usually no greater than 50 percent of the area median family income, based on the latest available eligibility limits established by HCD/HUD.

Zoning Ordinance: Regulations adopted by the City which govern the use and development of land within its boundaries and implements policies of the General Plan.

Zoning District: A designated section of a city or county for which prescribed land use requirements and building and development standards are uniform.

Appendix B

Affirmatively Furthering Fair Housing

Appendix B: Affirmatively Furthering Fair Housing

In 2018, the California governor signed AB 686 (Housing Discrimination: Affirmatively Further Fair Housing) requiring that all housing elements due on or after January 1, 2021, contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule. Under this state law, all California jurisdictions must ensure that laws, policies, programs, and activities affirmatively further fair housing opportunities throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familiar status, disability, and other characteristics protected by the California Fair Employment and Housing Act (FEHA).

The City of Burbank receives Community Development Block Grant (CDBG), HOME Investment Partnerships Act funds (HOME), and Section 8 funds each year from the federal government to support housing and community development activities that principally benefit low and moderate-income households. As a recipient of these funds, the City certifies that it will affirmatively further fair housing and utilize these funds to further the efforts of affordable housing in the City. To comply with federal law and the requirements of AB 686, the Burbank Housing Element 2021-2029 references information and analysis from the City of Burbank's Analysis of Impediments to Fair Housing Choice 2020-2025 (AI) to identify potential impediments to fair housing that are specific to Burbank. The Burbank AI is a review of impediments to fair housing choice in the public and private sectors, and involves: a comprehensive review of Burbank's laws, regulations, and administrative policies, procedures, and practices; an assessment of how those laws affect the location, availability, and accessibility of housing; an assessment of conditions, both public and private, affecting fair housing choice; and, recommendations for addressing the identified fair housing impediments.

1. Community Outreach

Housing Element Public Participation Program

As required by State law, all economic segments of the community must be provided an opportunity to review and comment on the Housing Element. As part of the development of the Housing Element, which also requires revisions to the Safety Element and an analysis of environmental justice issues in the General Plan, the City implemented a public participation program. The public participation program includes the following components:

- **Stakeholder Consultation Workshops.** Two virtual stakeholder consultation workshops were conducted online via Zoom on August 27, 2020. The first online stakeholder workshop was conducted for housing developers and the second workshop for housing service providers and housing advocates that serve the lower income community and special needs groups. The purpose of the workshops was to review current and projected housing needs and receive feedback on what strategies can best meet the housing needs of the community. Key participating service providers included: Family Promise of the Verdugos, Housing Rights Center, Los Angeles Family Housing, and St. David's Anglican Church.
- **Community Workshops.** Two virtual community workshops were conducted online via Zoom and on the Burbank YouTube Channel and local cable channel. The first virtual workshop was held on October 3, 2020 and included an informational presentation and discussion of housing and environmental justice issues facing the City in addition to opportunities for public input and questions on the Housing Element update. The second virtual community workshop on Housing

Element was held on February 27, 2021. The focus of this workshop highlighted the results of the online Housing Element survey, RHNA goals, housing opportunity sites, and potential housing programs. An example of one of the public comments related to fair housing was: How are new accessory dwelling unit (ADU) requirements accommodating disabled residents?

- **Housing Element Survey.** Housing Element survey (administered through MetroQuest) was available online from September 30, 2020 to January 4, 2021 in Armenian, English, and Spanish. There were a total of 227 survey respondents. Key survey questions related to fair housing included: ranking potential environmental justice programs and identifying disadvantaged communities.
- **City Website.** A website specifically for the Housing Element Update was established to provide an overview of the Housing Element process, announcement of events (i.e. workshops, survey), FAQs, and space to add public comments.
<https://www.burbankhousingelement.com/>
- **Noticing of Workshops.** Notices for the two community workshops were published in the *Burbank Leader*, posted on the City website and project webpage, and on the City's Facebook and Twitter accounts. Direct invitation letters and emails were sent to local housing service providers and stakeholders that participated in the August stakeholder meetings. In addition, over 20,000 flyers were distributed in census tracts with the majority of Burbank's lower and moderate-income areas. Announcements regarding the workshops were made at City Council, Planning Board, Senior Board, and Landlord Tenant Commissions meetings.

In compliance with the Americans with Disabilities Act (ADA), any resident in need of special assistance to participate in these online workshops could contact the City Clerk's Office by phone or email and accommodations would be provided. There were no public requests for special assistance to participate in these workshops. Additionally, to involve as many participants as possible at the community workshops, Armenian and Spanish language interpreters were available for the presentations and public comments and responses.

Copies of the workshop presentations, notices, online survey and results, and public comments are included as **Appendix F: Public Participation**.

The Draft Housing Element was made available for public review on the City's website starting on April 27, 2021. The Draft Element and subsequent Element revisions have been provided to the public through email notification to the City's extensive list of Housing Element stakeholders, including numerous organizations that represent lower income and special needs households, and through posting on Burbank's social media platforms. The City has received five comment letters on the Draft Element (included in Appendix F), and has considered and as deemed appropriate, addressed these comments in the Element. The public will continue to have opportunities to provide comments on the Housing Element, EIR, and other General Plan elements at the Burbank Planning Board and City Council public hearings scheduled for August – September 2022.

Fair Housing Plan Outreach

As part of the development of Burbank's Analysis of Impediments to Fair Housing Choice and to better understand the fair housing issues facing its residents, the City implemented a community outreach program consisting of community advisory meetings, a resident survey, service provider interviews, and a City Council meeting.

The City conducted two community advisory meetings (November 26, 2019 and December 3, 2019) and one stakeholder meeting on December 9, 2019. The meetings provided the Burbank community to gain awareness of fair housing laws and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, invitations were distributed via e-mail, if available, to agencies and organizations that serve these communities. Meetings were announced through social media outlets; the City's five focus neighborhoods (predominately low-income neighborhoods); local non-profits; faith-based groups; and local committees/groups. Residents and housing advocates were invited to attend the meetings to gather their feedback.

To supplement the citizen advisory meetings, a fair housing survey (administered through SurveyMonkey) was made available to Burbank residents at City Hall and the City's website: www.burbankca.gov. The survey was available in Armenian, English, and Spanish to reflect the diversity of Burbank's residents. During the eight-week survey period, 41 completed surveys were submitted by Burbank residents.

Public comments were solicited on the Draft AI during the public review period, but no written comments were received. In addition, the public was able to provide comments at the Burbank City Council virtual public meeting held on July 28, 2020.

Fair Housing Services Outreach

The Housing Rights Center (HRC), a non-profit organization under contract with the City of Burbank, conducts extensive community outreach to promote fair housing choice awareness and knowledge of state and federal fair housing laws. This includes outreach to Burbank residents, real estate professionals, apartment owners/managers, medical professionals, and service providers. HRC also conducts periodic trainings to the following agencies and organizations: Burbank Landlord-Tenant Commission; Burbank Advisory Council on Disabilities; Burbank Association of Realtors; Joslyn Adult Center (seniors); Burbank Unified School District; and the Burbank Housing Authority. Specific education and outreach activities include the following:

- Dissemination of fair housing literature on federal and state fair housing laws, familial status, persons with disabilities, landlord responsibilities, etc.
- Mailings to targeted groups such as the disabled, local landlords, property owners, and the local real estate community. Fair housing literature, including materials in English, Spanish, Armenian and Asian languages.
- Press releases, radio and television interviews to raise awareness of the needs of families and communities hardest hit by the economic downturn and foreclosure crisis, and the variety of implications for fair housing.
- Placement of newspaper advertisements promoting fair housing choice in a variety of periodicals including the Burbank Leader, La Opinion, La Voz Latina, and the San Fernando Valley African American Chronicle News.
- Publication of articles in various housing trade magazines, distribution of a fair housing newsletter, and publication of opinion editorials in major newspapers to increase public awareness of key fair housing issues such as tenant evictions in foreclosed properties.
- Hosting of fair housing booths, trainings, and workshops at various fairs, conferences, and webinars. These events are aimed at educating housing providers, including property managers, landlords, real estate groups, fair housing testers, and local housing agencies.

- Sponsorship of the annual Fair Housing Poster Contest through the Burbank Unified School District, Boys & Girls Club, YMCA, and Parks and Recreation Centers as part of National Fair Housing Month every April.

2. Assessment to Fair Housing Issues

Local Fair Housing Issues

The information from the Housing Element Needs Assessment chapter, the public participation program, and the Burbank AI revealed numerous fair housing issues facing the City, including those summarized below:

- **Affordable housing of various types for all Burbank’s residents.** Available housing for Burbank’s growing low and moderate-income workforce is not being produced in the market. According to the Regional Housing Needs Assessment (RHNA), Burbank will need to accommodate 8,772 housing units during the 2021-2029 planning period; and of this total, 45 percent will be for lower-income households and 16 percent for moderate-income households. The cost burden has significant impacts on the special needs population.
- **Public education of fair housing services and fair housing rights.** There is a continuing need for public awareness of available housing services and knowledge of fair housing laws for both tenants and landlords/property owners.
- **Fair housing for the special needs population.** The HRC investigates and responds to allegations of illegal housing discrimination. Between 2017 and 2019, the HRC handled 40 discrimination complaint inquiries in Burbank. Of these inquiries, only three rose to the level of a discrimination case with the HRC. Certain special needs groups experienced a high incidence of discrimination complaints. Housing for persons with physical disabilities continues to be the top discrimination complaint in Burbank, consistent with other areas in Los Angeles County served by the HRC.
- **Availability of accessible housing.** Through Housing Element community outreach effort, comments received included the shortage of housing designed to accommodate persons with disabilities. Building Code requirements (Title 24) for accessibility in new construction are insufficient to meet the need for accessible housing in the community, particularly with the City’s aging population.
- **Neighborhood revitalization.** There are neighborhoods in Burbank that require revitalization to improve the existing housing and economic conditions of the area; especially with the limited funds available for redevelopment. Two neighborhoods/census tracts in southeast Burbank have been designated as areas of “moderate” resources and opportunities by the California Tax Credit Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) (refer to Tables B-3 and B-4).

Regional Fair Housing Issues

At the regional level, the Los Angeles County Analysis of Impediment to Fair Housing Choice also identified fair housing impediments in the urban areas of the county. The following were identified as private sector and public sector impediments to fair housing:

Private Sector Impediments

- Harassment of existing and potential renters
- Denial of available housing units in the rental market and home purchase market
- Refusal to accept rental applications or to rent
- Discriminatory terms, conditions, privileges, or facilities relating to rental housing
- Failure to make reasonable accommodations or modifications

- Wrongful eviction
- Hesitancy to file complaints for fear of retaliation
- Failure to provide leasing documents in native languages
- Steering activities by rental housing agencies
- Preferences stated in advertisements for rental housing
- Steering, redlining, reverse redlining, and blockbusting activities
- Preferences given to persons not utilizing home buyer assistance programs
- Denial of home purchase loans
- Predatory lending in the home purchase market
- Failure to comply with accessibility requirements in construction of housing units
- Inequitable investment of Community Reinvestment Act resources
- Failure by housing consumers to actively participate in fair housing outreach including education sessions or AI public input opportunities

Public Sector Impediments

- Failure to establish compliant-based fair housing policies on the part of several participating cities
- Ineffective fair housing outreach and education efforts
- Failure to adequately enforce fair housing laws
- Onerous access to fair housing services
- Failure to make reasonable accommodation in the public housing market, including allowance of service animals
- Extortion and bribery activities in response to requests to be placed on housing assistance lists
- Land use and planning decisions and operational practices resulting in unequal access to government services, such as transportation
- Historical establishment of policies and practices resulting in segregation of minority populations
- Insufficient establishment of building codes regarding special needs housing
- Lack of enforcement of codes, including health and safety codes and ADA codes
- Decisions regarding definitions of “family,” “dwelling units” and related terms
- Implementation of exclusionary policies
- Failure to engage in actions to affirmatively further fair housing and the AI process by government agencies
- Insufficient inclusion of persons adversely affected by housing discrimination as protected classes under federal or state law including domestic violence victims and the elderly

Fair Housing Enforcement and Capacity

Landlord-Tenant services are provided through the Housing Right Center (HRC), Burbank Housing Authority (BHA), and the Landlord-Tenant Commission. The HRC provides general counseling and referrals over the phone and via appointment regarding tenant/landlord issues, the BHA provides information and resources, and complaints requiring mediation are directed to the City’s Landlord-Tenant Commission.

Housing Rights Center

Housing discrimination in the city is addressed by HRC under contract with the City of Burbank. HRC provides housing discrimination assistance and tenant/landlord information to Burbank residents, landlords, and property owners. Fair housing services provided by HRC include: investigation of allegations or complaints regarding unfair housing practices; community outreach and education; fair housing audits and testing; and, counseling or referrals to other agencies when individuals may have been victims of discrimination.

One of the primary roles of the HRC is to provide investigation and response to allegations of illegal housing discrimination. As discussed in the Burbank AI, between 2017 and 2019, the HRC handled 40 discrimination complaint inquiries in Burbank. Of these inquiries, only three rose to the level of a discrimination case with the HRC. Certain special needs groups evidence a high incidence of discrimination complaints. Housing for persons with physical disabilities continues to be the top discrimination complaint in Burbank, consistent with other areas in Los Angeles served by the HRC. The majority of these complaints pertain to the request for a property manager to make a reasonable modification to accommodate a tenant's disability. Families with children (familial status) and persons with mental disabilities are the primary other protected classes facing alleged discrimination in Burbank.

Hate crimes is another issue related to housing discrimination. Hate crimes are committed because of a bias against race, religion, sexual orientation, ethnicity, disability, gender, and/or gender identity. Based on Federal Bureau of Investigation (FBI) hate crime statistics for 2016-2019, a total of 26 hate crimes were recorded in the City. During this four-year period, 13 recorded hate crimes were motivated by a bias against race and ethnicity, ten by religion, and three by sexual orientation.

In addition to fair housing complaints, HRC receives calls from Burbank residents requesting assistance with landlord/tenant issues. Between 2017 and 2019, the HRC handled complaints or requests for assistance involving 220 Burbank tenants or landlords. Of these tenant/landlord issues, calls related to notices were the most prevalent, followed by inquiries regarding substandard conditions and security deposits. HRC was able to resolve approximately two-thirds of the complainant's issues, with the remainder of complainants referred to another agency or group.

In comparison, the Los Angeles County Service Area which includes 47 cities participating in the Urban County of the Community Development Commission of the County of Los Angeles (CDC), received a total of 2,610 fair housing complaints from 2008 through 2016 (based on HUD data). The most common basis for a complaint was for some form of disability, which accounted for more than one-third of the total complaints. The other basis of complaints included: race, familial status, retaliation, national origin, sex, religion, and color.

Burbank Housing Authority

Landlord-tenant services are also provided through BHA, which provides information and referrals over the phone regarding tenant/landlord issues. Any complaints requiring mediation are directed to the City's Landlord-Tenant Commission.

In an effort to provide landlords and tenants information regarding their legal responsibilities and rights, the BHA and the Landlord-Tenant Commission has developed a handout that covers topics such as: leases, rental agreements, and documentation; rent control and rent increases; termination of lease and/or eviction; harassment, retaliation, and discrimination concerns; and foreclosure and legal matters. Furthermore, information on landlord and tenant resources, rights and responsibilities are posted on the City's website and updated regularly.

Burbank Landlord-Tenant Commission

The Burbank Landlord-Tenant Commission was established by the City for the purpose of mediating disputes between property owners/managers and tenants. The Commission addresses conflicts involving property maintenance, repairs, lease disagreements, and rent increases, while also promoting the rights and responsibilities of both tenants and landlords in Burbank.

According to the Burbank AI, during the 2017-2019 period there were 125 landlord-tenant disputes, representing less than one percent of Burbank’s rental housing. The disputes ranged from rent raises without proper notice to broken appliances and failures to adhere to building codes. The most prevalent issue tenants disputed pertained to rent increases and unjust seizures of security deposits.

Patterns of Integration and Segregation

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

The race and ethnic composition of a population influence fair housing issues to the extent that certain racial and ethnic groups may experience discrimination. These influences are due to factors such as color, language spoken, or other cultural factors, which can affect resident’s ability to find housing, obtain home financing, or have unrestricted access to housing of their choice. As presented in Table B-1, the majority of Burbank’s residents in 2018 were non-Hispanic White (57%), a slight decrease from 59 percent in 2000. Hispanic residents in Burbank represent almost one-quarter (24%) of the total population. Although Asian residents represent a relatively smaller segment of the population, the share of Asian residents nearly quadrupled since 1980, increasing from three percent in 1980 to 12 percent in 2018. The City’s Black/African American population has remained relatively limited, rising from less than one percent in 1980 to three percent in 2018. Although the Census does not identify Armenian residents, this is an important ethnic community in Burbank. According to the Armenian National Committee of America, it is estimated that over 16,000 Armenians reside in Burbank, or 15 percent of the City’s total population.

Unlike the racial/ethnic composition patterns of Burbank, in Los Angeles County the Hispanic population is the largest ethnic group, represents almost one-half (49%) of the total county residents. The non-Hispanic White population is slightly over one-quarter (26%). Both the countywide Asian (14%) and Black (8%) populations account for larger proportions of Asians and Black residing in Burbank.

Table B-1
Racial and Ethnic Composition 2018

Racial/Ethnic Group¹	Burbank		Los Angeles County	
	Population	Percent	Population	Percent
White	59,122	56.7%	2,659,052	26.3%
Hispanic	24,720	23.7%	4,893,603	48.5%
Asian	12,786	12.3%	1,451,560	14.4%
Black/African American	2,676	2.6%	795,505	7.9%
Native American	329	0.3%	20,307	0.2%
Other	4,642	4.5%	278,055	2.7%
TOTAL	104,275	100%	10,098,052	100%

Source: U.S. Census ACS 2014-2018

¹ White, Asian, Black/African American, Native American, and Other racial/ethnic groups denote non-Hispanic.

The degree of minority concentration in the City can also assist in determining the extent of fair housing impediments. Exhibit B-1 illustrates the overlap of Burbank's racial/ethnic distribution by block groups and poverty levels by census tracts. As the exhibit shows, Burbank's minority residents -- in this case the non-White population -- was concentrated primarily in block groups immediately southwest of the I-5 corridor and in the vicinity of Hollywood Burbank Airport. Of the concentrated non-White (60-80%) areas, the three block groups located east of the airport, north Vanowen Street, and southwest of I-5 (combined as CT 3105.01), had the highest non-White concentration levels ranging from 74 percent to 77 percent and relatively low levels of poverty (10-20 percent of population). The highest level of poverty in the City was in CT 3107.03, located north of the I-5 at the City limits with Glendale. Over one-quarter (28%) of the population in this census tract had incomes below the poverty level. Exhibit B-3 also shows that areas west of the City had very high concentrations (80-100%) of non-White population and poverty level in the 20-30 percent range.

To meet the threshold of a racial/ethnic concentration area, the census tract must have a non-white population of 50 percent or more. The poverty threshold is a census tract with 40 percent or more of individuals living at or below the poverty line. According to the HUD database used to create the map in Exhibit B-1, census tracts within Burbank do not meet the defined parameters for a R/ECAP designation. Exhibit B-2 shows no R/ECAP census tracts in Burbank and the nearest R/ECAP areas to Burbank are located approximately five miles to the west in San Fernando Valley and nine miles to the south near Downtown Los Angeles.

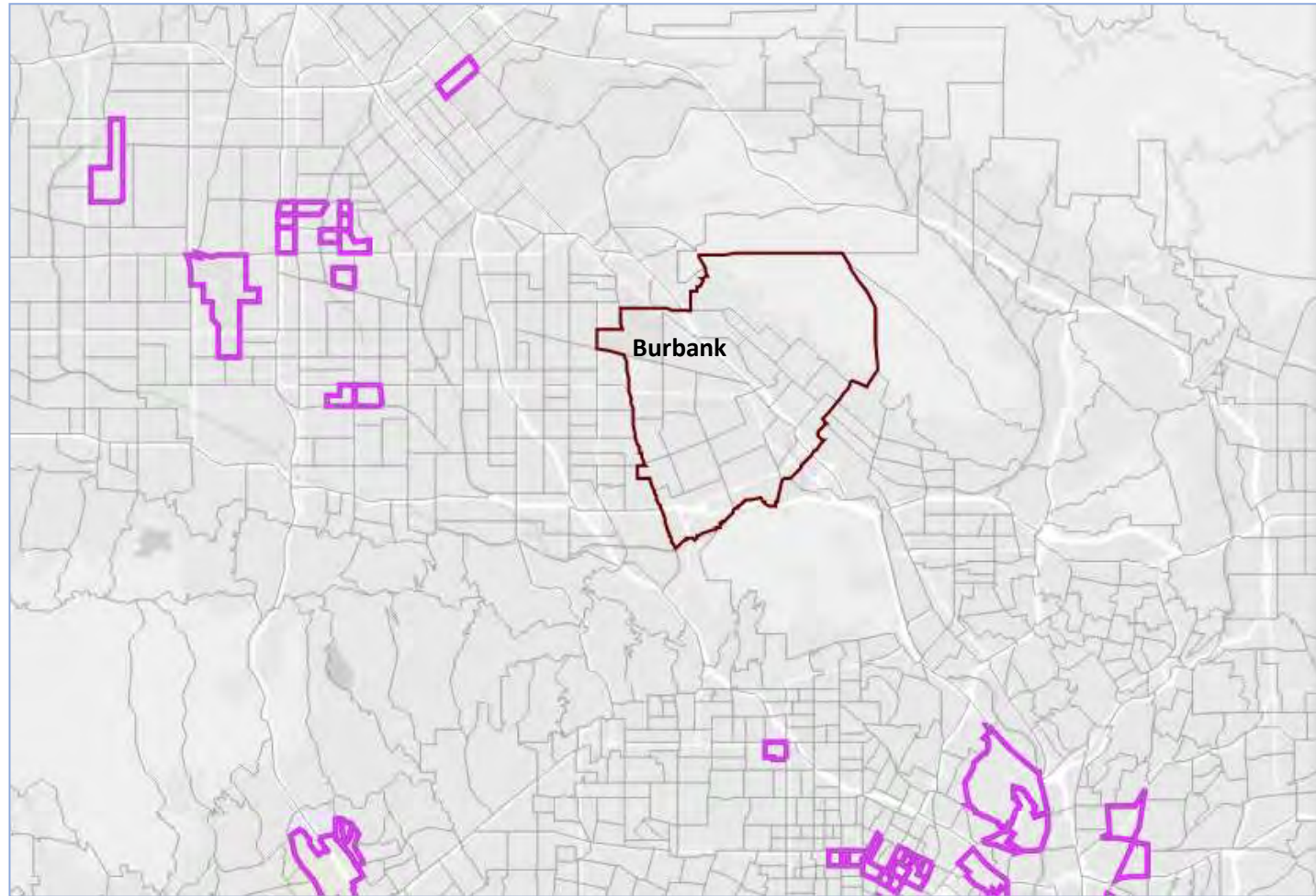
Areas of Affluence

While the Racially/Ethnically Concentrated Areas of Poverty has been the focus of Federal fair housing policies to address racial poverty and segregation, the AFFH is also required to examine the other side of the spectrum, which is the racially concentrated areas of affluence (RCAA). According to a HUD policy paper, RCAA is defined as an affluent, White community. Patterns of segregation in the United States show that of all racial groups, Whites are the most severely segregated¹. Therefore, this AFFH will examine the percentage of White population and median household income as an indicator of areas of affluence.

As mentioned above, based on the Census ACS 2014-2018 estimates presented in Table B-1, the majority (57%) of Burbank's residents are non-Hispanic White (White), as compared to only 26 percent countywide. The spatial distribution of predominantly White census tracts (greater than 50%) is shown in Exhibit B-3 for the City and the eastern San Fernando Valley/western San Gabriel Valley region. The map shows that the northern and southwestern areas of the City as well as downtown Burbank tend to have larger populations of White residents. From a regional perspective, Exhibit B-3 also shows sizable and predominantly White areas east of the City, while areas west of Burbank are primarily non-White and majority Hispanic.

¹ *"Racially Concentrated Areas of Affluence: A Preliminary Investigation"* authored by Edward G. Goetz, Anthony Damiano, and Rashad A. Williams of the Center for Urban and Regional Affairs, University of Minnesota.

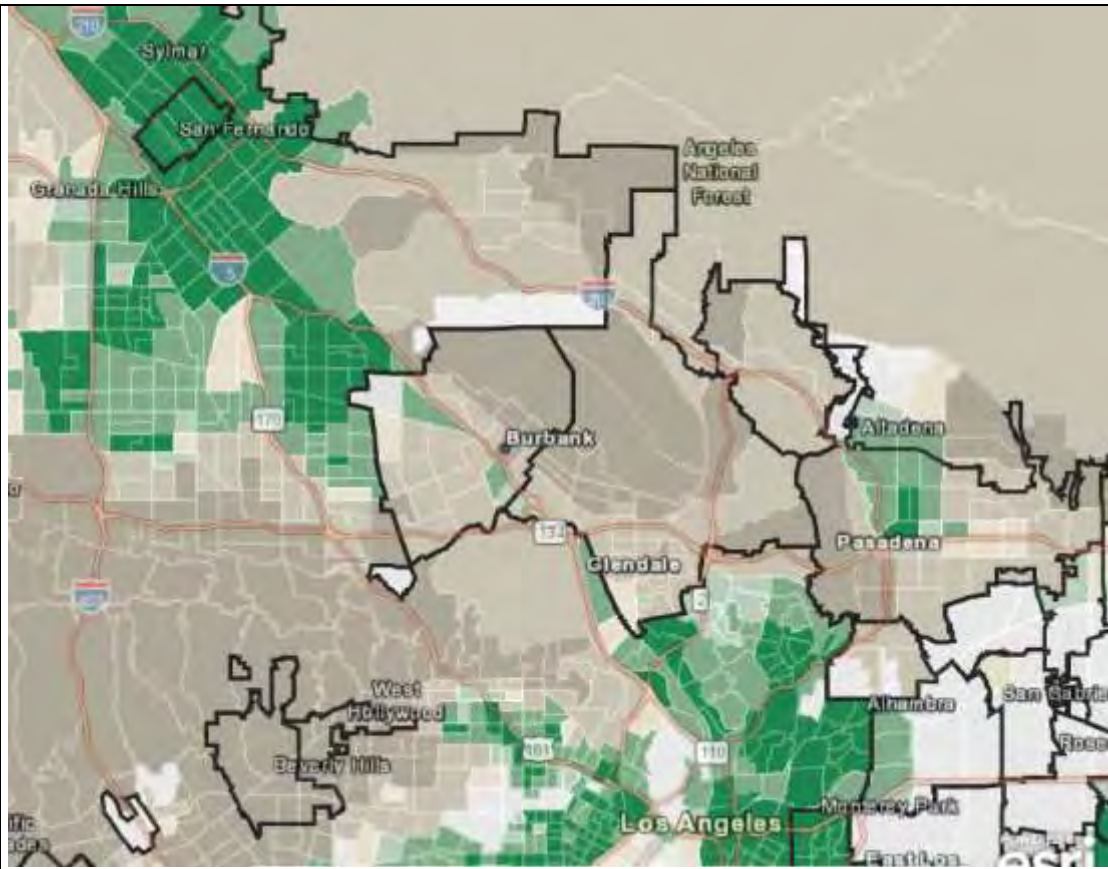
Exhibit B-2
Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)



 R/ECAP Census Tract

Source: HUD, 2021 Racially or Ethnically Concentrated Areas of Poverty

Exhibit B-3
Prominent Racial/Ethnic Population



(R) Predominant Population - White Majority Tracts

- Dominance Value
- Predominant (gap > 50%)
 - Sizeable (gap 10% - 50%)
 - Slim (gap < 10%)

(R) Predominant Population - Hispanic Majority Tracts

- Dominance Value
- Predominant (gap > 50%)
 - Sizeable (gap 10% - 50%)
 - Slim (gap < 10%)

Source: HCD AFFH Data Viewer (ACS 2015-2019)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

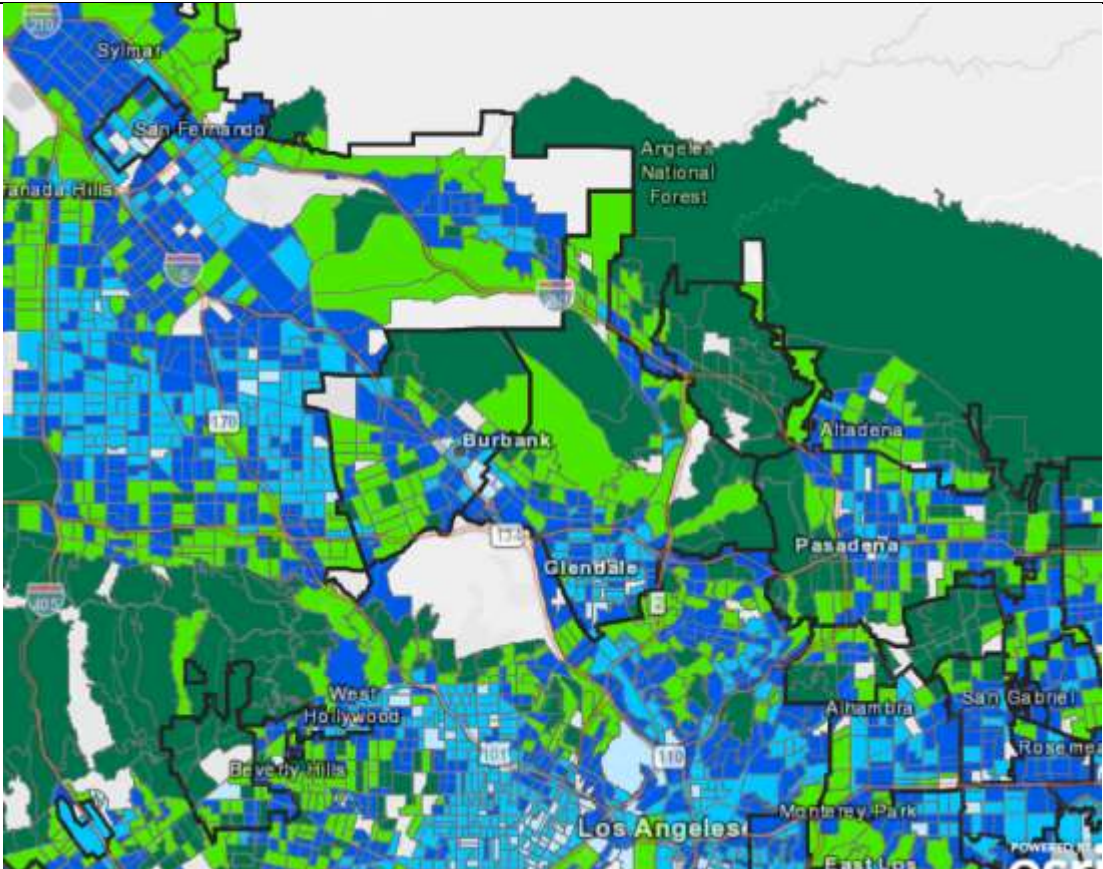
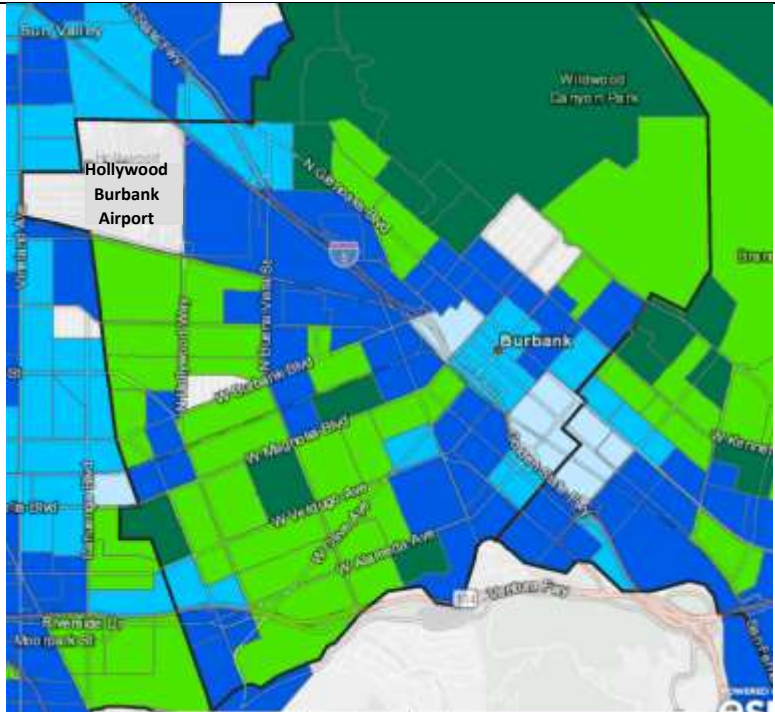
Median household income is another indicator of areas of affluence. As presented in Table B-2, Burbank’s 2018 median household income is estimated at \$73,277, which is higher than the County’s median household income of \$64,251. When examining the disparity between incomes of Whites to total households for both Burbank and the County, the differences are pronounced. For Burbank, the White median household income of \$72,992 is lower than the City’s overall median income by a minus four percent. This is a city where the White population is the majority. In comparison to the County, the White median household income is significantly higher than the median income of the County by 31 percent. In the County, Whites only represent about one-quarter of the total population.

From a spatial perspective, Exhibit B-4 shows that higher median income census block groups (greater than \$87,100 -- green and dark green shades) are located primarily in the northern and southwestern areas of the City. There are 11 census block groups in the northern and southern areas of the City with median household incomes exceeding \$125,000 (dark green shade). At the regional scale, income patterns to the east and southwest of the City are similar to those of Burbank, while to northwest of the City, the income patterns are generally lower.

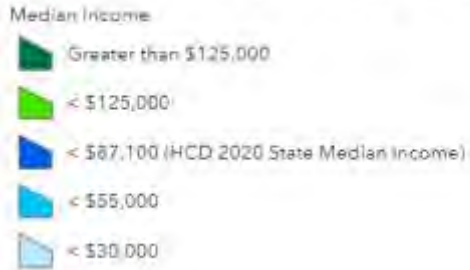
In conclusion, the two exhibits show that predominantly White areas of the City have higher median household incomes compared to the surrounding areas. Therefore, the overlap of these two indicators highlights the areas of the City that are considered racially concentrated areas of affluence.

Table B-2		
Non-Hispanic White Median Household Income and Population – Burbank and Los Angeles County		
	Burbank	Los Angeles County
Median HH Income		
NH White Alone	\$72,992	\$83,847
All Households	\$73,277	\$64,251
% of NH White Population	57%	26%
Source: Census ACS 2014-2018 (S1903)		

**Exhibit B-4
Median Income**



(R) Median Income (ACS, 2015-2019) - Block Group



Source: HCD AFFH Data Viewer (ACS 2015-2019)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Dissimilarity Index

A measure of residential segregation is the dissimilarity index, which is a commonly used measure of community-level segregation. As defined by HUD, the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block-groups. This means that levels of segregation between racial/ethnic groups and non-Hispanic Whites as measured by the percent of population that would need to move to achieve perfectly balance neighborhoods or complete integration. The values of the dissimilarity index range from 0 to 100, with a value of zero representing complete integration between the racial/ethnic groups and non-Hispanic Whites, and a value of 100 representing complete segregation. HUD indicates that a dissimilarity index of less than 40 is considered low segregation; 40-54 is considered moderate segregation and greater than 55 is considered high segregation.

Table B-3 presents the 2000 and 2010 dissimilarity indices of a racial/ethnic group to non-Hispanic White for the City of Burbank and the Los Angeles-Long Beach-Glendale Metropolitan Area. In 2010, the City was considered relatively integrated. All three minority groups (non-Hispanic Black, Hispanic, and non-Hispanic Asian) to non-Hispanic Whites in the City had dissimilarity indices of less than 40.0 -- the maximum index considered low segregation. The 2010 dissimilarity index for Blacks was 20.7, Hispanics was 27.7, and Asians was 9.6. This means that 27.7 percent of the Hispanic population would need to move into predominately White census tract areas to achieve perfect or complete integration. In comparison, Burbank was significantly less segregated (or more integrated) in comparison to the Metropolitan Area as a whole for all three minority groups. In 2010, the Metropolitan Area had a dissimilarity index of 65.0 for Blacks, 63.9 for Hispanic, and 55.6 for Asian -- all levels considered as high segregation.

Ethnic Group to Non-Hispanic White	2000		2010	
	% of Total Population	Dissimilarity Index	% of Total Population	Dissimilarity Index
City of Burbank				
Black/African American	2.3%	23.8	3.0%	20.7
Hispanic	24.9%	27.4	24.5%	27.7
Asian	10.2%	12.0	13.4%	9.6
Los Angeles-Long Beach-Glendale Metropolitan Area				
Black/African American	10.0%	67.4	8.9%	65.0
Hispanic	44.6%	63.1	47.7%	63.9
Asian	12.9%	48.2	14.9%	55.6

Source: U.S. Census 2000 and 2010; Spatial Structures in the Social Sciences at Brown University
 Notes: White, Asian, and Black groups denote non-Hispanic.

Persons with Disabilities

A disability is defined as a long lasting physical, mental, or emotional condition that impairs an individual's mobility, ability to work, or ability for self-care. The special housing needs of disabled persons result from limited and often fixed incomes; shortage of available group-living opportunities and accessible housing designs; higher health care costs; and proximity to services and transit. According to the Burbank AI, 36 of the total 40 discrimination inquiries to the Housing Rights Center (HRC) between 2017 and 2019 were related to physical or mental disabilities.

According to the Census ACS 2014-2018 data, it was estimated that 11 percent of Burbank's non-institutionalized population had some type of disability, as compared to 10 percent countywide. In comparison to other neighboring cities, Burbank is higher than the City of La Cañada-Flintridge (7%), Los Angeles (10%), and Pasadena (10%), but lower than the City of Glendale (14%). For Burbank residents, the likelihood of having a disability varied by age -- from two percent of people under 18 years old, to seven percent of people 18 to 64 years old, and to 40 percent of those 65 and over. At the county level, seniors (age 65 and over), which was also the highest age group with a disability, accounted for 36 percent of the total non-institutionalized population.

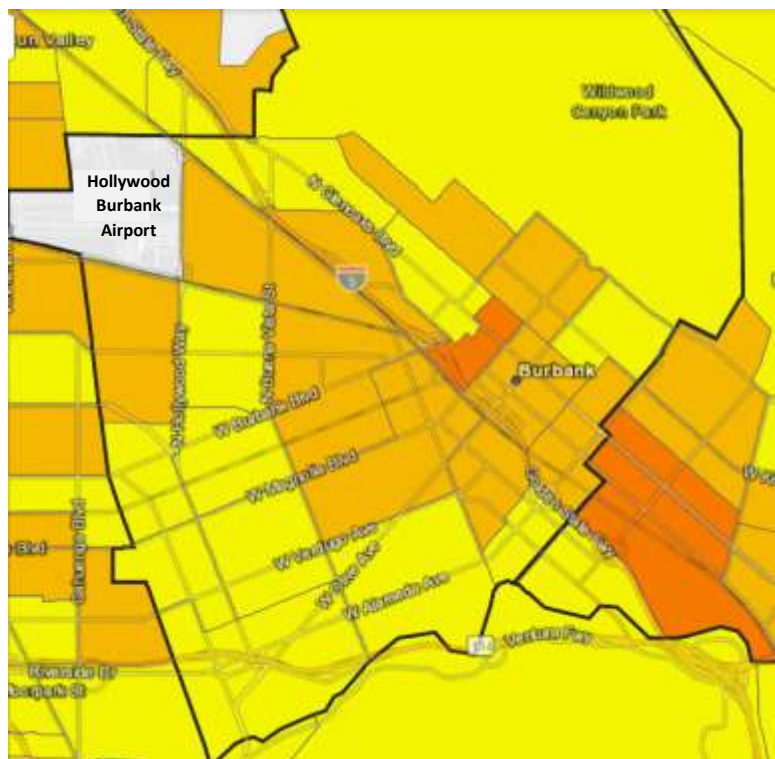
Within Burbank, there are no areas of high concentration of persons with disabilities. As illustrated in Exhibit B-5, which is based on the Census ACS 2015-2019 data, only one census tract (CT 3107.01) has a moderate (20-30%) concentration of persons with disabilities. According to the Census data, Census Tract 3107.01, which is located near Downtown Burbank north of the I-5, shows that 22 percent of the populations live with a disability. Also, over one-half (54%) of this census tract's disabled population is over the age of 65 years. All the other census tracts in the City have a percentage of persons with disabilities of less than 20 percent. Exhibit B-5 also shows other areas in the eastern San Fernando Valley/western San Gabriel Valley region. At this regional perspective, census tracts with 30-40 percent of its population with disabilities are highly concentrated in the Los Angeles City communities of Sylmar, Pacoima, and near Downtown Los Angeles. Two census tracts in the exhibit show concentrations exceeding 40 percent, including the area along the foothills of the Angeles Forest in the community of Tujunga and the Veterans Affairs Medical Center in West Los Angeles.

Familial Status

Familial status refers to the marital status of the head of household with or without children under the age of 18. Data on familial status can provide insight into potential segregation issues in a community. The HCD AFFH Data Viewer maps shown in Exhibits B-6 to B-9, illustrate the spatial distribution of the familial status categories for the City of Burbank and the eastern San Fernando Valley/western San Gabriel Valley region.

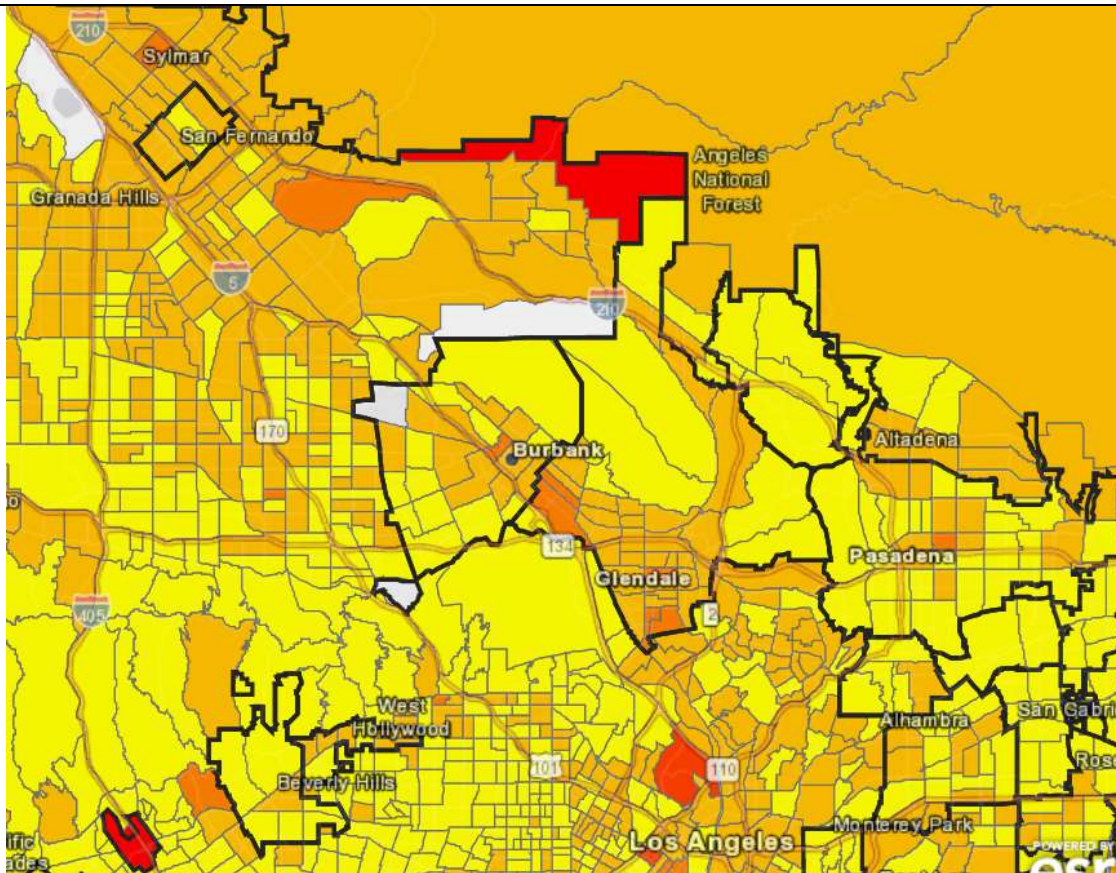
- **Adults Living Alone** (Exhibit B-6). Thirty-two percent (32%) of Burbank adult heads of households and 25 percent of Los Angeles County adult heads of households live alone. As shown on Exhibit B-6, the largest share of adults living alone (20-40%) in Burbank are located in four census tracts: CT 3107.01 and CT 3107.02 located in Downtown Burbank; CT 3118.01 eastern border south of the I-5; and CT 3116 in the Media District of southern Burbank. The pattern of adults living alone is similar through the eastern San Fernando Valley/western San Gabriel Valley region, with the exception of one census tract in Pasadena where a single census tract has a concentration of 40-60 percent of adults living alone.

Exhibit B-5
Percent of Population with Disability



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

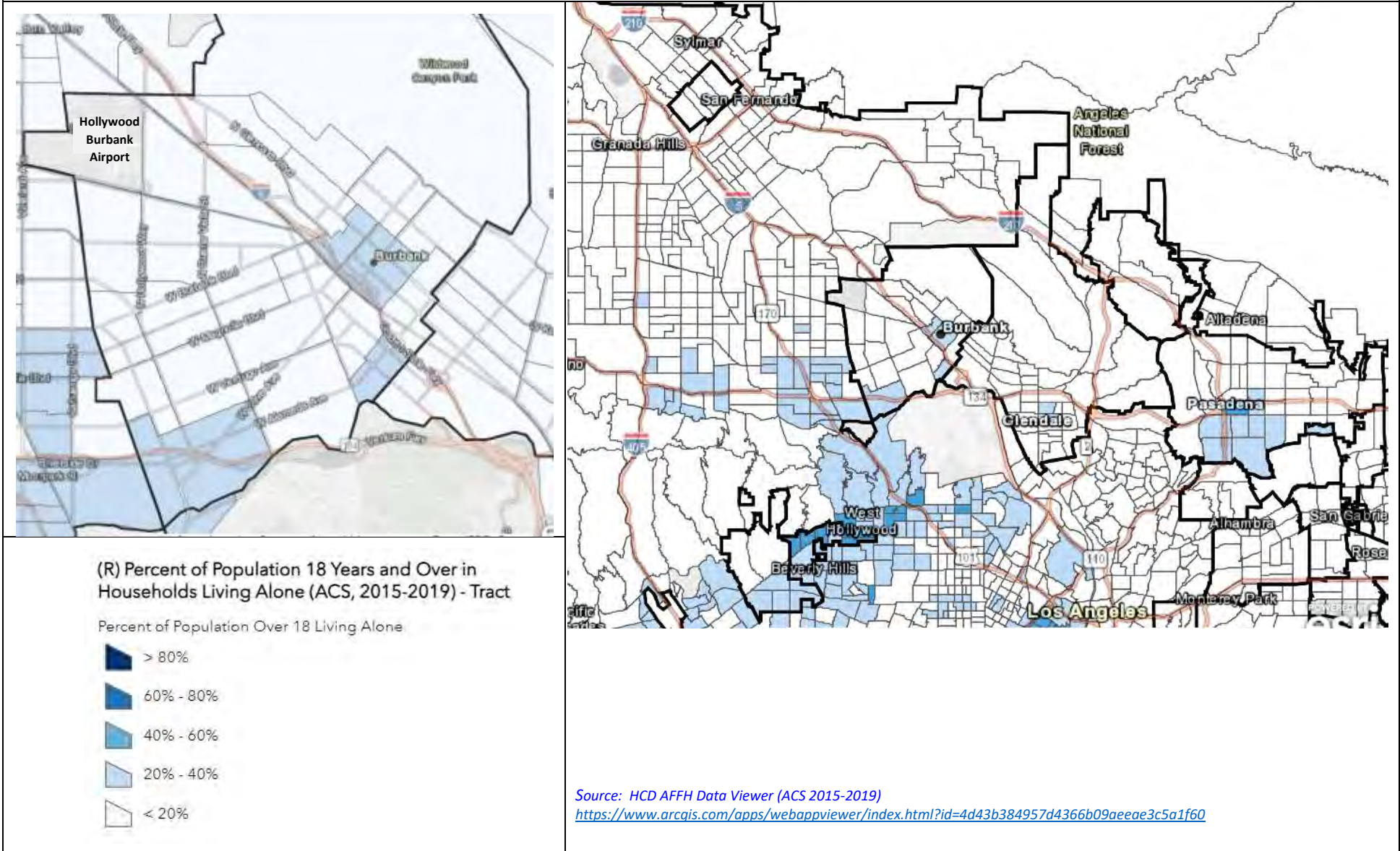
Percent of Population with a Disability



Source: HCD AFFH Data Viewer (ACS 2015-2019)

<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Exhibit B-6
Percent of Adults Living Alone

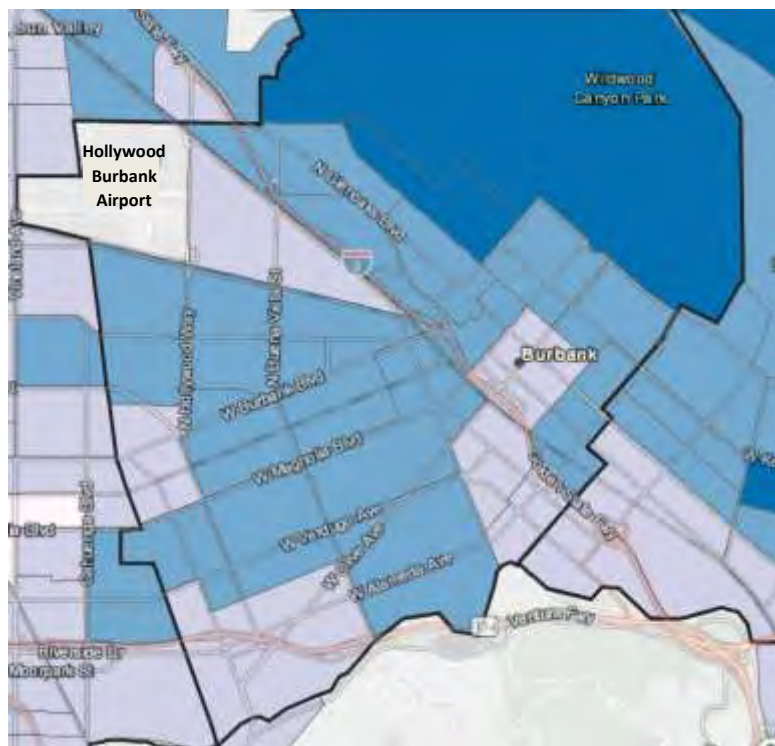


- **Adults Living with Spouse** (Exhibit B-7). Higher percentages (60-80%) of Burbank’s population in married households are located in the northern portion of the City (CT 3101 and CT 3103). These are primarily single-family residential neighborhoods located north of 6th Street and in the foothills of the Verdugo Mountains. The remaining areas of the City have approximately 40 to 60 percent in married households. These percentages are similar to many areas in region east of Burbank (western San Gabriel Valley region). Areas in the west of Burbank (eastern San Fernando Valley region) generally show a pattern of lower percentage (20-40%) of adults living with a spouse. Estimates indicated that the percentage of adults living with their spouse is approximately 45 percent in the County.
- **Children in Single Female-Headed Households** (Exhibit B-8). Female-headed households with children under the age of 18 require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. In addition, families with children sometimes face housing discrimination for fear of property damage. Children in female headed households in Burbank represent four percent of the City’s total households, as compared to Los Angeles County as a whole, which represents seven percent of the total households. Geographically, children in female-headed households are concentrated in a CT 3118.02, which is located in the eastern portion of the City, south of the I-5. Exhibit B-8 shows that 40-60 percent of the children in female single-parent households are located in this census tract. All the other census tracts in the City are below 40 percent, with most below 20 percent. This overall pattern is exhibited through most of the neighboring areas of the eastern San Fernando Valley/western San Gabriel Valley region.
- **Children in Married-Couple Households** (Exhibit B-9). As mentioned above, households with children face housing discrimination, and according to the Burbank AI, HRC have observed an increase in fair housing violations towards families with children throughout their fair housing service area, such as signs posted in common areas limiting usage by children. Exhibit B-9 shows the highest percentage (>80%) of children in married-couple households are located in the northern portion of Burbank, north of the I-5, and in the central portion of the City, south of Vanowen Street and north of Magnolia Boulevard. The census tracts with the lowest percentage (40-60%) are located near the downtown area -- CT 3107.01 north of the I-5 and CT 3118.02 south of the I-5. The spatial patterns of children in married-couple households are similar to many areas to the west and east of Burbank. Based on the Census ACS 2014-2018 data, a comparison between the City and County shows that Burbank had a higher percentage (42%) of married-couple households with children than Los Angeles County (39%).

Income

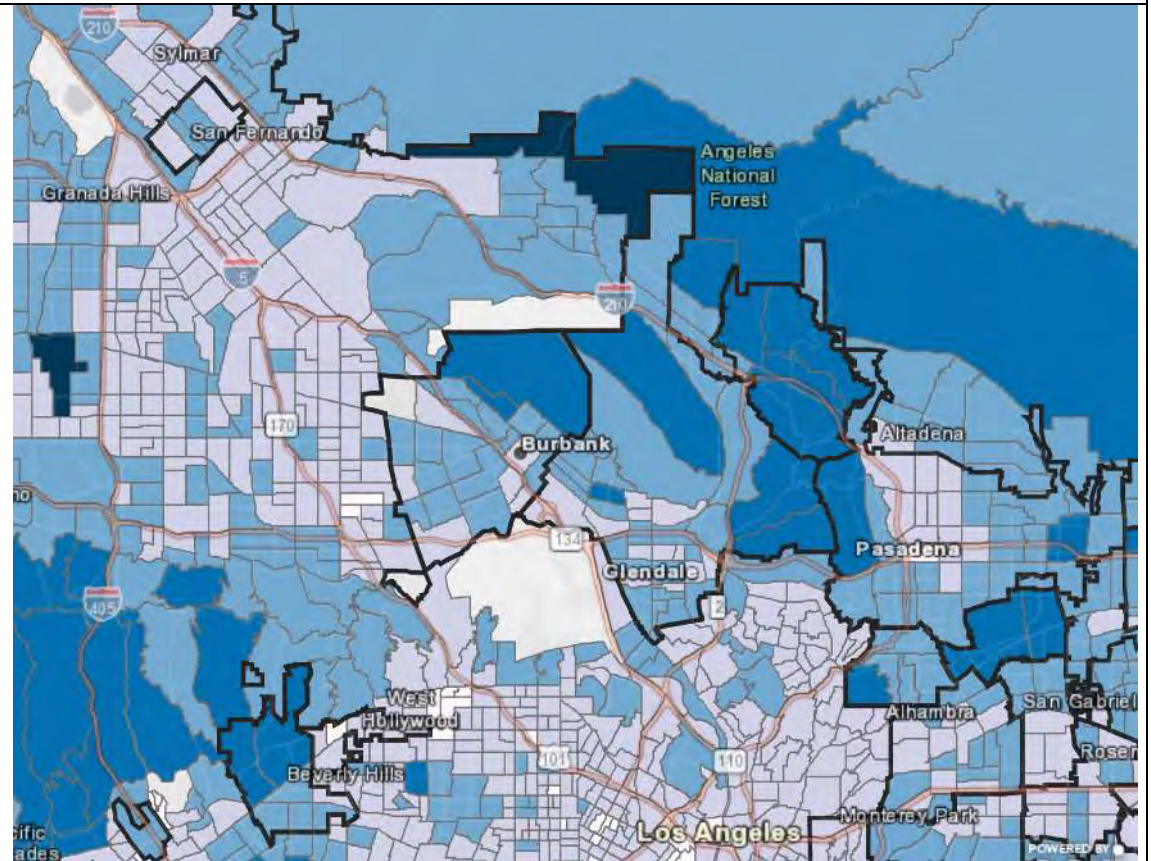
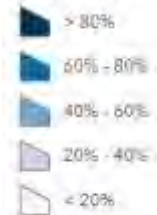
Income is an important factor that can contribute to integration and to overcome patterns of segregation. As previously discussed, in 2018 the median household income in Burbank was \$73,277 as compared to the County’s median household income \$64,251. Exhibit B-10 illustrates areas of Burbank’s low-moderate income population areas and previous Exhibit B-1 shows the level of poverty by census tract.

Exhibit B-7
Percent of Adults Living with Spouse



(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

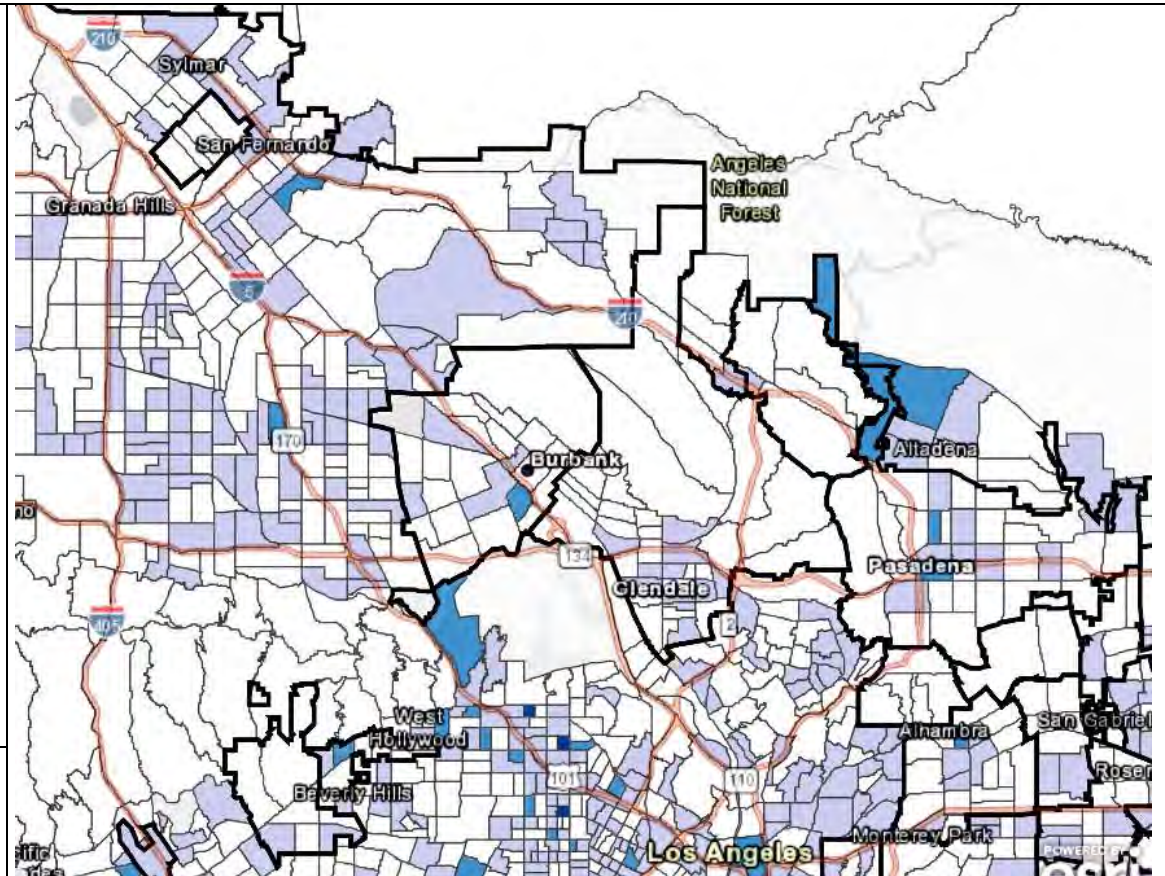
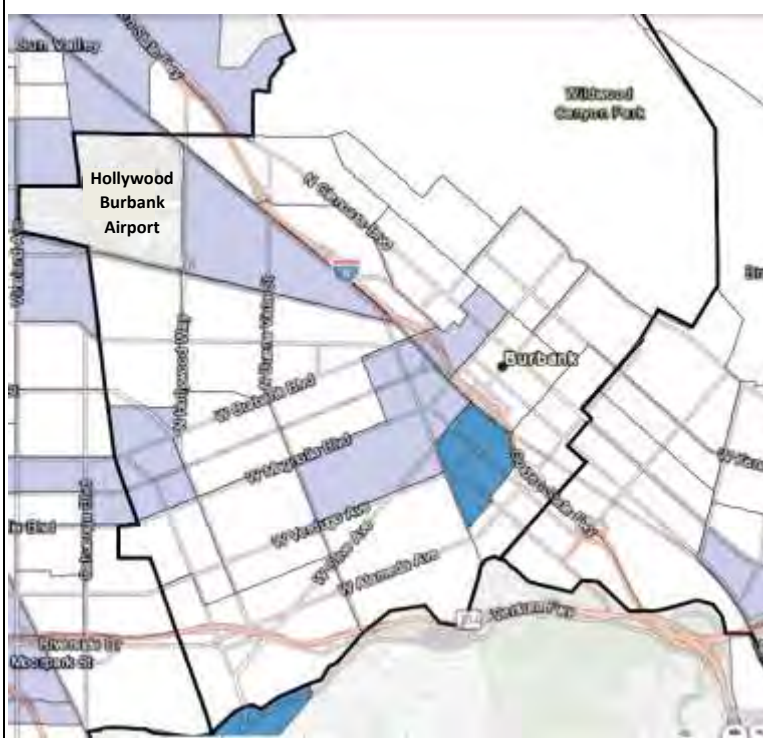
Percent of Population 18 Years and Over in Households Living with Spouse



Source: HCD AFFH Data Viewer (ACS 2015-2019)

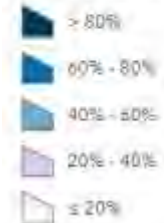
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Exhibit B-8
Percent of Children in Female Householder with No Spouse/Partner



(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

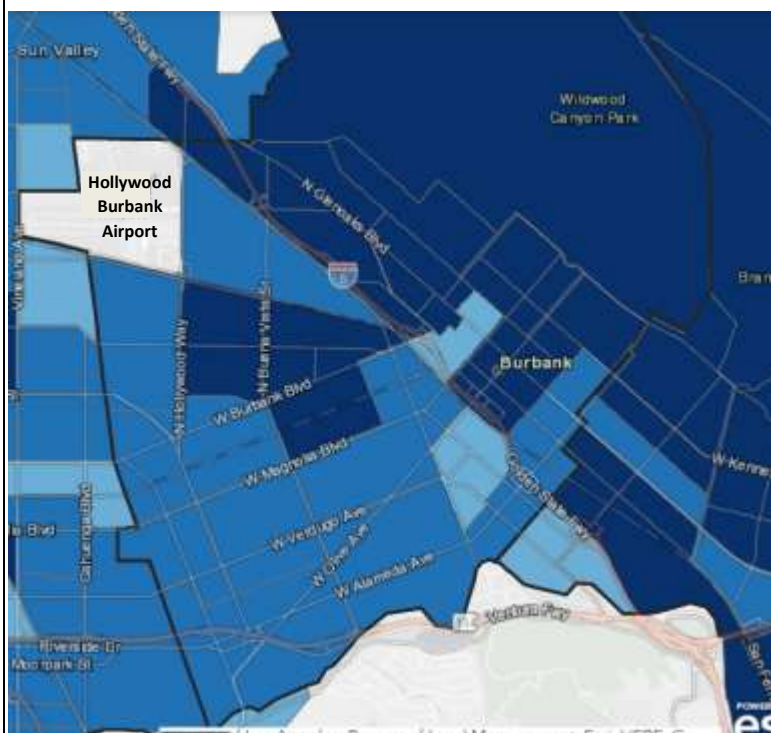
Percent of Children in Female Households, No Spouse/Partner Present Households.



Source: HCD AFFH Data Viewer (ACS 2015-2019)

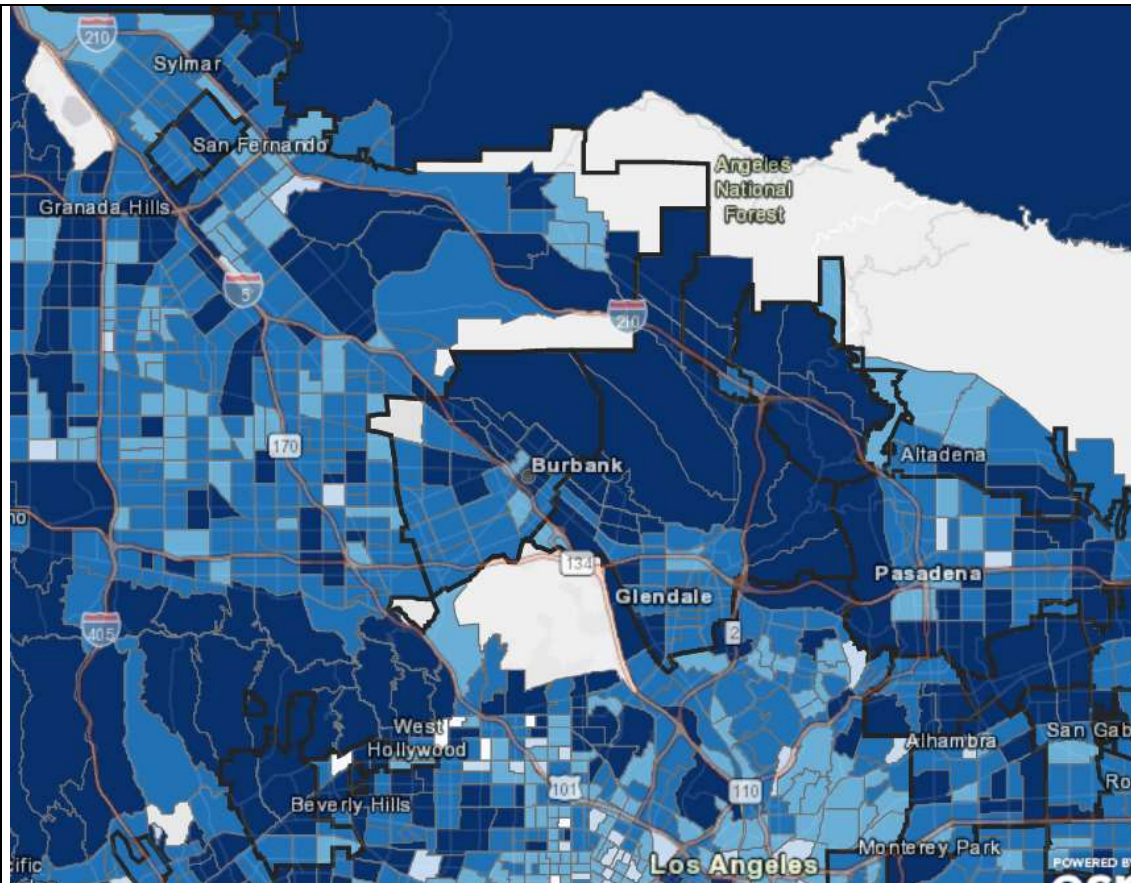
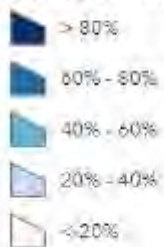
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Exhibit B-9
Percent of Children in Married-Couple Households



(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

Percent of Children in Married-Couple Households



Source: HCD AFFH Data Viewer (ACS 2015-2019)

<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeae3c5a1f60>

Exhibit B-10
Low-Moderate Income Population

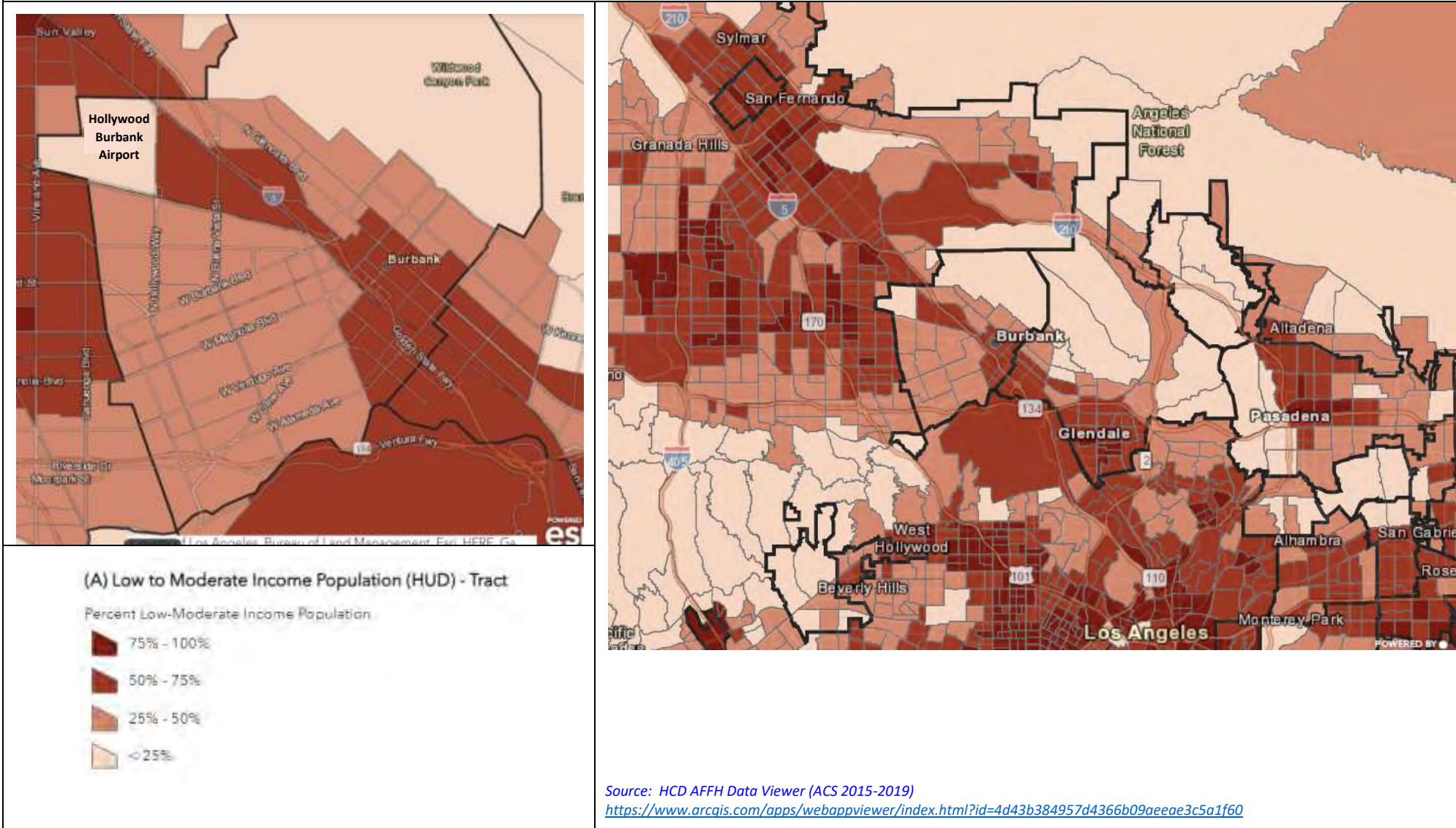


Exhibit B-10 shows the geographic distribution of the percentage of low-moderate income population by census tracts in Burbank and the surrounding eastern San Fernando Valley/western San Gabriel Valley region. The map shows census tracts with highest percentage (50-75%) of the low-moderate income population concentrated along the I-5 corridor. These are the areas within the City that are proposed for future investment and new development with the adoption and implementation of the Burbank Downtown TOD Specific Plan and Golden State Specific Plan. The vast majority of census tracts are within the 25-50 percent low-moderate income population in the City. Exhibit B-10 also shows more areas to the west and east of Burbank to have higher concentrations of low to moderate income population, those that are 50 percent and over.

Another measurement of income is the percentage of residents that live below the poverty line. This is illustrated in previous Exhibit B-1, which shows that Census Tract 3107.03 has the highest percentage (25%) of its residents living in poverty. This census tract is located in the southeastern portion of Burbank on the border with Glendale and north of I-5. All the other census tracts in the City show less than 20 percent of the population living below the poverty line. Areas outside of Burbank showing 30-40 percent are in the poverty category include census tracts in communities of eastern San Fernando Valley, census tracts in the Cities of Glendale and Pasadena, and areas in the vicinity of Downtown Los Angeles. In comparison to the Los Angeles County, Burbank has a significantly lower percentage of families living below the poverty level (7% Burbank verses 12% Los Angeles County).

Disparities in Access to Opportunity

TCAC/HCD Opportunity Areas

Based on economic, environmental, and educational criteria established by the California Tax Credit Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD), the majority of the Burbank's census tracts are identified as areas of Highest and High Resources. This indicates that Burbank residents have a high level of access to resources and opportunities that can impact educational attainment, earnings from employment, and economic mobility.

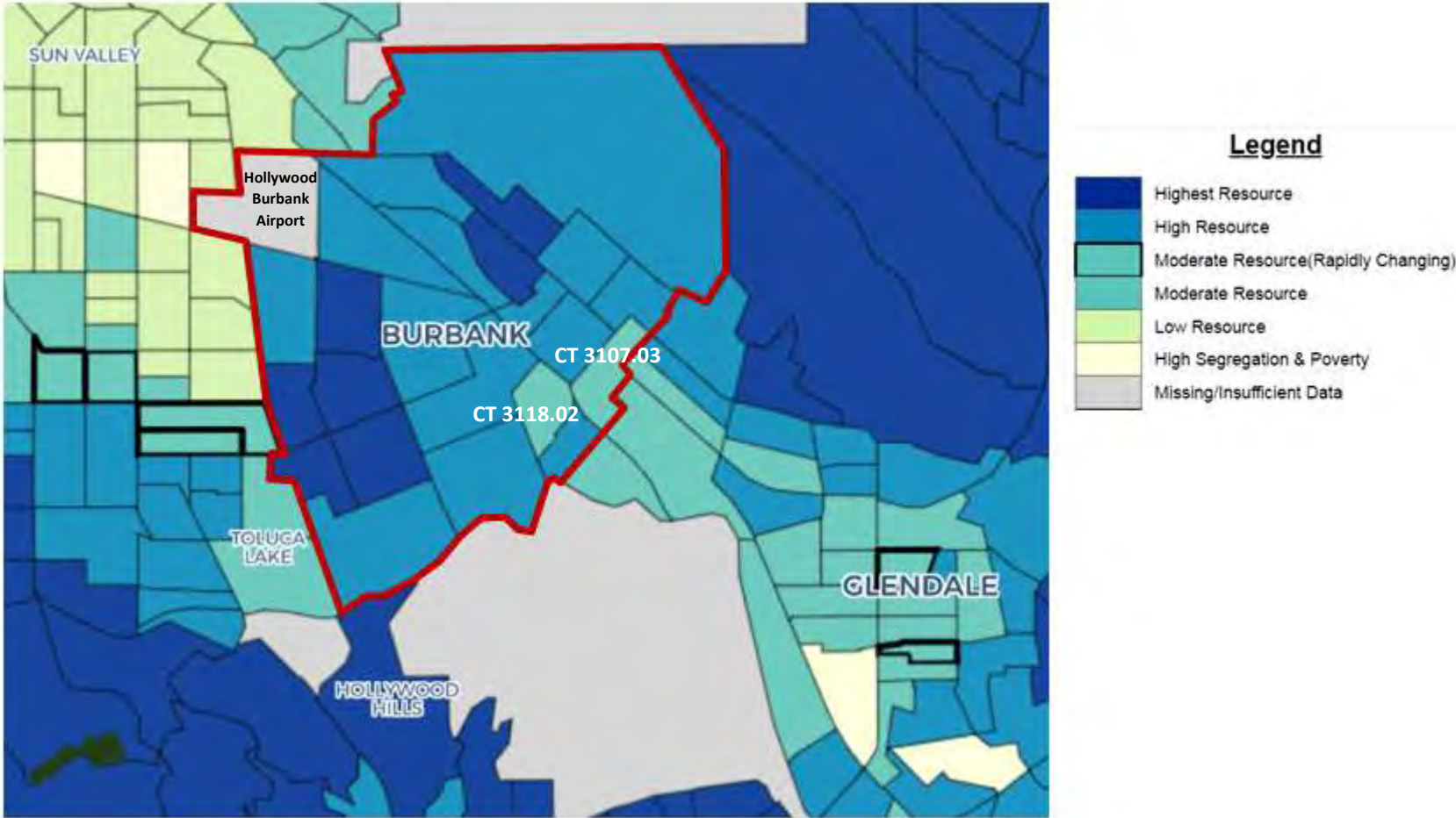
Table B-4 presents resource categories and index scores for the four key criteria for each census tract and Exhibit B-11 illustrates the spatial distribution of TCAC/HCD Opportunity Areas in Burbank. According to the table and exhibit, only two of Burbank's 24 census tracts are identified as Moderate Resource, with the remaining tracts identified as Highest or High and one not applicable because the census tract is Hollywood-Burbank Airport (CT 9800.10). These two Moderate Resource census tracts (CT 3107.03 and CT 3118.02) are located in the southeastern portion of the City along the I-5 corridor.

Table B-4
Burbank Opportunity Resource Levels

Census Tract	Final Category	Economic Domain Score (by region)	Environmental Domain Score (by region)	Education Domain Score (by region)	Composite Index Score
310100	High Resource	0.802	0.125	0.848	0.408
310201	High Resource	0.674	0.624	0.836	0.418
310202	High Resource	0.776	0.526	0.794	0.417
310300	Highest Resource	0.865	0.433	0.848	0.579
310400	High Resource	0.784	0.090	0.854	0.368
310501	High Resource	0.596	0.038	0.862	0.160
310601	High Resource	0.438	0.054	0.854	0.102
310602	Highest Resource	0.838	0.258	0.848	0.504
310701	High Resource	0.574	0.082	0.858	0.218
310702	High Resource	0.612	0.046	0.811	0.113
310703	Moderate Resource	0.300	0.027	0.732	-0.179
310800	High Resource	0.663	0.046	0.822	0.162
310900	High Resource	0.740	0.069	0.862	0.321
311000	Highest Resource	0.760	0.203	0.885	0.457
311100	High Resource	0.775	0.150	0.754	0.270
311200	Highest Resource	0.845	0.451	0.826	0.518
311300	Highest Resource	0.849	0.462	0.905	0.658
311400	Highest Resource	0.843	0.364	0.892	0.601
311500	Highest Resource	0.835	0.313	0.921	0.631
311600	High Resource	0.840	0.219	0.810	0.433
311700	High Resource	0.860	0.085	0.841	0.434
311801	High Resource	0.834	0.032	0.827	0.288
311802	Moderate Resource	0.450	0.030	0.843	0.037
980010	#N/A	#N/A	#N/A	#N/A	#N/A

Source: California Tax Credit Allocation Committee and the California Department of Housing and Community Development

Exhibit B-11
TCAC/HCD Opportunity Areas



Source: 2021 TCAC/HCD Opportunity Map, <https://belonging.berkeley.edu/2021-tcac-opportunity-map>

Table B-5 provides a summary profile of the two Moderate Resource census tracts. A closer look at CT 3107.03 indicates that almost two-thirds (65%) of its residents are White. The poverty scale for CT 3107.03, with a 20-30 percent of population below the poverty level is consistent with tract's 63 percent lower income households. The median age of homes is approximately 50 years old. This tract is comprised predominantly renters (90%) with over two-thirds of the households facing a housing cost burden. This area falls within The Burbank Center Plan (BCP), which was adopted in 1997 as an economic revitalization plan, and is currently being updated and integrated within the Downtown TOD Specific Plan. The City and its former Redevelopment Agency have attracted numerous major employers to this census tract, including a 455,000-square foot IKEA store and a Home Depot, as well as Ralph's and Trader Joes grocery stores. The South San Fernando Streetscape Plan provided a variety of public improvements to the area to create a more visually pleasing and pedestrian-oriented environment.

Census Tract 3118.02 is also identified as Moderate Resource. Its racial/ethnic composition is majority Latinx. Poverty levels are also high, but there is a lower percentage (45%) of lower income households than CT 3107.03. The Lake/Verdugo Focus Neighborhood falls within this tract, and the City and Burbank Housing Corporation (BHC) have to date improved 72 rental units and provided as long-term affordable housing. A major employer in this tract is the Burbank Recycling Center. A large portion of this tract falls within the Downtown Burbank TOD Specific Plan and will benefit from investments under the Plan.

Table B-5
Moderate Resource Census Tracts

	Census Tract	
	3107.03	3118.02
Population	4,693	4,135
Race/Ethnicity	White: 65% Latinx: 19% Other: 7% Asian: 6% Black: 3%	Latinx: 53% White: 26% Asian: 14% Black: 4% Other: 4%
Poverty Status (refer to Exhibit B-1)	20-30%	<10%
% Low-Income Households	63%	45%
Type of Housing	Single-family: 10% Multi-family: 90%	Single-family: 19% Multi-family: 81%
Median Year Housing Built	1971	1972
% Owner/% Renter	Owner: 10% Renter: 90%	Owner: 15% Renter: 85%
Number of Housing Choice Vouchers	64	10
Overcrowding (>1.01/room)	12%	18%
Overpayment (>30% of Inc. to Housing)	69%	43%
Planned Investments (Economic growth and Community benefits)	CDBG Eligible CT Community benefits and public improvements will continue under Downtown TOD Specific Plan.	CDBG Eligible CT BHC will continue to improve housing conditions & affordability. Downtown TOD Specific Plan will provide new community benefits and public improvements.

Sources: ACS 2014-2018 and 2015-2019; Burbank Housing Corporation; Urban Displacement Project, UC Berkeley
<http://www.urbandisplacement.org/>

HUD Opportunity Indicators

The U.S. Department of Housing and Urban Development (HUD) developed the opportunity indicators to help inform communities about disparities in access to opportunity. The index scores are based on nationally available data sources and an assessment of residents' access to key resource opportunities in the City and the region. Table B-6 provides the index scores (ranging from zero to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The higher the value, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the value, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The higher the value, the higher the labor force participation and human capital is in a neighborhood.
- **Transit Trips Index:** The higher the value, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the value, the lower the cost of transportation is in that neighborhood.
- **Jobs Proximity Index:** The higher the 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.

Education

The City is within the jurisdiction of the Burbank Unified School District (BUSD) which provides public school services to Burbank residents for grades kindergarten through 12. BUSD oversees eleven elementary schools, three middle schools, three high schools, and an alternative school that offers child development, special education, independent learning, and adult education programs. Schools within BUSD have a combined enrollment of approximately 15,000 students. Information provided through the California Department of Education shows that the District's high school graduation rate in 2020 was 92 percent, in comparison to the state graduation rate of 87 percent. In addition, approximately one-third (35%) of the District's students are socioeconomically disadvantaged and 10 percent are English as second language learners². Census ACS 2014-2018 data show that Burbank residents had a higher education attainment level than the county as a whole. This data shows that 58 percent of Burbank residents 25 years and over had at least graduated from high school and that 42 percent had a bachelor's degree or higher. This compares to countywide data that shows 51 percent of its resident 25 year and over had graduated from high school and 32 percent had a bachelor's degree or higher.

² California Department of Education, School Dashboard, <http://www.caschooldashboard.org>

Table B-6
HUD Opportunity Indicators, by Race/Ethnicity

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Trip Index	Low Transport. Cost Index	Job Proximity Index	Environ. Health Index
City of Burbank							
Total Population							
White, Non-Hisp.	66.07	77.83	69.01	90.93	82.61	95.33	18.47
Black, Non-Hisp.	61.92	78.18	66.59	92.63	85.67	95.81	17.68
Hispanic	63.54	76.67	64.48	91.41	83.79	96.11	17.77
Asian/Pac. Is., Non-Hisp.	65.65	77.35	68.07	91.38	82.87	95.80	18.70
Nat. Am., Non-Hisp.	61.48	77.62	65.86	91.48	83.56	95.74	17.47
Population below federal poverty line							
White, Non-Hisp.	56.67	78.67	63.31	91.65	85.76	95.52	18.71
Black, Non-Hisp.	66.73	79.31	69.13	93.95	87.65	94.59	17.15
Hispanic	57.48	79.15	60.27	92.08	85.97	96.45	18.24
Asian/Pac. Is., Non-Hisp.	61.82	80.52	68.64	94.44	86.64	96.44	19.95
Native Am., Non-Hisp.	44.00	69.84	74.00	94.00	81.00	94.81	18.00
Los Angeles-Long Beach-Anaheim Region							
Total Population							
White, Non-Hisp.	65.19	68.03	67.43	77.63	73.13	54.59	21.35
Black, Non-Hisp.	36.07	33.82	35.34	87.25	79.02	40.72	11.92
Hispanic	35.53	39.72	35.73	86.48	77.78	43.70	12.36
Asian/Pac. Is., Non-Hisp.	55.03	61.94	57.64	85.13	75.98	51.11	13.13
Native Am., Non-Hisp.	48.40	50.70	48.58	81.04	75.36	45.88	17.68
Population below federal poverty line							
White, Non-Hisp.	53.66	60.62	59.62	83.19	78.51	56.98	18.46
Black, Non-Hisp.	24.12	28.03	26.41	88.34	81.07	36.90	11.74
Hispanic	25.05	33.70	29.50	89.09	80.94	44.63	10.63
Asian /Pac. Is., Non-Hisp.	45.45	57.59	51.41	88.58	80.61	52.88	11.05
Native Am., Non-Hisp.	33.63	39.10	36.05	84.43	78.22	47.65	16.22

Source: HUD AFFH, <https://eqis.hud.gov/affht/>

Burbank residents have a high degree of access to educational opportunities. The TCAC/HCD educational domain scores in previous Table B-4 include math proficiency, reading proficiency, high school graduation rates, and student poverty rates at the census tract level. These scores range from a low of 0.73 (CT 3107.03) to as high as 0.92 (CT 3115). Exhibit B-12 at the end of this section shows that all census tracts in Burbank, with the exception of CT 3107.03 (located in the southeast portion of the City north of I-5), have educational scores exceeding 0.75, indicating the most positive educational outcomes. As presented earlier in the discussion of Table B-5, CT 3107.03 is one of two Moderate Resource tracts in Burbank, and is characterized by higher rates of poverty and lower incomes. With an educational score of 0.73, it is just slightly below the 0.75 threshold. Students in CT 3107.03 that attend public schools are enrolled at Joaquin Miller Elementary School (located within this census tract), John Muir Middle School (approximately 1-1.5 miles north of this census tract), and Burbank High School (approximately 1-1.5 miles north of this census tract). According to the California Department of Education's Smarter Balanced Summative Assessment, standardized test results show that during the 2018-2019 academic year, students of Joaquin Miller Elementary School, John Muir Middle School, and Burbank High School all performed better than the test results of the overall school district and the state for their respective grades. For example, 68 percent of students at Joaquin Miller Elementary Schools met or exceeded English Language Arts/Literacy (ELA) standards and 58 percent met or exceeded mathematics standards during the 2018-2019 academic year. This compares to district-wide student performances of 65 percent for ELA and 51 percent for mathematics.³ These test result patterns are also similar at the middle school and high school levels. In addition, a K-12 school rankings prepared by U.S. News & World Report based on student diversity, teachers, counselors, test scores, and district spending data, ranked Joaquin Miller Elementary School number two among 11 elementary schools in the district, only behind Providencia Elementary.⁴

Census Tract 3107.03 also has a concentration of persons with income below the poverty level; however, as discussed above, the schools serving this census tract appear to rank high and score high in standardized testing. Another population group that needs greater access to educational resources is children in female headed households. These children are concentrated in CT 3118.02 which is located south of I-5 in southeast Burbank. However, as Table B-4 shows, the education domain score for this census tract is 0.84, which indicates there is access to educational opportunities.

Exhibit B-12 at the end of this section presents a map of educational score levels by census tract using the HCD AFFH Data Viewer, and illustrates that Burbank's educational scores are higher than those of Glendale, Pasadena, and the Los Angeles City communities in eastern San Fernando Valley.⁵

School proficiency from a regional perspective is also presented in the HUD-based Table B-6. The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Therefore, the higher the score, the higher the school system quality is in a neighborhood. As the table shows, the school proficiency of Burbank's total population by

³ California Department of Education, *California Assessment of Student Performance and Progress. The Smarter Balanced Summative Assessments for English language arts/literacy (ELA) and mathematics annually assesses student knowledge and skills for ELA and mathematics, as well as how much students have improved since the previous year. These measures help identify and address gaps in knowledge or skills early so students get the support they need for success in higher grades and for college and career readiness.* <https://caaspp-elpac.cde.ca.gov/caaspp/>

⁴ US News and World Report, https://www.usnews.com/education/k12?int=top_nav_K-12

⁵ While census tract 9800.10 is depicted in Exhibit B-12 as having a low educational score, this tract in fact is entirely comprised of the Hollywood Burbank Airport and has no population, consistent with Table B-4.

race/ethnicity is higher than those in the Los Angeles-Long Beach-Anaheim region as a whole. For example, the non-Hispanic White population and Hispanic population of Burbank have school proficiency indices of 78 and 77, respectively, which are significantly higher than the regionwide indices of the non-Hispanic White (68) and Hispanic (40) population. These school proficiency patterns by race/ethnicity of the total population are also similar for the population below the federal poverty line. In summary, Burbank does not have any substantial differences in access to educational opportunities.

Economics

Burbank is a major employment center in the region with over 130,000 jobs. However, average annual unemployment rates for the City in 2019 was five percent, higher than unemployment rates in Los Angeles County (4%) and the state as a whole (4%).

The City scores high in terms of access to economic opportunities. The TCAC/HCD economic domain scores in previous Table B-4 range from a low of 0.300 (CT 3118.02) to as high as 0.865 (CT 3103), with Exhibit B-13 showing that that majority of the City's census tracts scored greater than 0.75 indicating the most positive economic outcomes. The northeastern and southwestern portions of the City scored the highest, while more modest economic scores were concentrated in areas along the I-5 corridor. Three census tracts have lower economic domain scores (0.25 – 0.50), which include Burbank's two Moderate Resource census tracts (CTs 3107.03 and 3118.02) in the southeastern portion of the City, and CT 3106.01 located north of I-5 in the Peyton/Grismer Focus Neighborhood. All three of these tracts are characterized by a higher than average (50 - 75%) low and moderate income population (refer to Exhibit B-10). However, these census tracts are in close proximity to jobs throughout the City, but in particular those jobs in the Downtown District. All three census tracts (CTs 3106.01, 3107.03, and 3118.02) are within or adjacent to the Downtown District, which include large employment centers such as the Burbank Civic Center (City Hall and other governmental departments), and retail commercial establishments in and around Burbank Town Center. The Town Center alone has over one million square feet of floor area. Census Tract 3107.03 also includes the largest IKEA store in the United States, as well as Car Max and Home Depot. City staff has indicated that Census Tract 3107.03 is approximately one mile from Disney Imagineering and DreamWorks Animation in the adjacent City of Glendale, which provide job opportunities for Burbank residents. Furthermore, residents of Census Tract 3118.02 are within 1.0-1.5 miles of six of the top ten major employment centers in the City (Walt Disney Company, Warner Brothers, Providence St. James Medical Center, ABC Inc., and Nickelodeon Animation -- refer to Housing Element Table 1-5). Census Tract 3106.01 is adjacent to the Downtown District and the Airport District, which is west of I-5. The Airport District includes major retail employment centers such as Lowe's, Target, Walmart, and Costco, as well as Hollywood Burbank Airport, two Marriott Hotels, and entertainment-related businesses.

City staff has identified recently approved commercial and mixed-use projects that will provide additional employment opportunities for Burbank residents, including those in Census Tracts 3106.01, 3107.03, and 3118.02. The following is a list of approved commercial and mixed-use projects:

- **Netflix Animation.** Streaming giant Netflix selected Burbank's Airport District for its worldwide animation headquarters in what was 2020's largest new LA county office lease. The project encompasses 171,000 sq ft on seven stories at 2300 W Empire Avenue. The project permit was issued in 2021.
- **Titmouse.** An animation production company signed a 95,000 sq. ft. deal at 2835 N Naomi Street in Burbank's Airport District. Permits for tenant improvements were finalized in 2021.
- **Warner Bros. Tour Center.** Located at 4000 Warner Boulevard, the 79,800-sq. ft. studio tour center is in the Media District. The project was opened to the public 2021.

- **Providence Saint Joseph ER and Urgent Care.** Located at 501 S Buena Vista Street in the Media District, this project will include a 34,500-sq. ft. 44-bed emergency room and an 8,500-sq. ft. 12-bed urgent care. The permit was issued in 2020 and construction is continuing as of May 2022.
- **Avion Burbank.** Project is located at 3001 N Hollywood Way in the City's Airport District. It includes one million sq. ft. of industrial/space, 142,000 sq. ft. of creative office space, 15,000 sq. ft. of retail/restaurant space, and a 150-room hotel. The project opened to the public in 2021, with the hotel under construction as of May 2022.
- **Warner Bros. Second Century.** An 800,000-sq. ft. office space project designed by Frank Gehry. It is to be located on West Olive Avenue in the Media District. Anticipated opening in 2023.
- **First Street Village Mixed-Use.** Located on First Street between Magnolia Boulevard and Palm Avenue in Downtown. The project will include 275 apartments and 18,876 sq. ft. of retail space, with an anticipated opening in 2023.
- **La Terra.** 777 Front Street in Downtown Burbank. It includes 573 residential units, 1,067 sq. ft. of retail space, and a 307-room hotel. Anticipated opening in 2023-2025
- **Airport Replacement Terminal.** 2627 N Hollywood Way is 355,000 sq. ft. and includes 14 gates, new parking structures, and taxiway extensions. Anticipated opening in 2025.
- **South San Fernando Mixed-Use.** Located at 624-628 S San Fernando Boulevard in Downtown Burbank, includes 42 residential rental units with ground floor retail/ office. Approved by the Planning Board in 2020
- **AC Hotel.** This 196-room AC Hotel will be located at 550 N Third Street in the Downtown District. As of May 2022, the project is in City Plan check.

In comparison to the region, economic opportunities in Burbank are similar to those available to Glendale and Pasadena residents, but higher than in the communities in eastern San Fernando Valley, including the City of San Fernando.

Exhibit B-14, Jobs Proximity map, clearly shows that all of Burbank is in close proximity to jobs, that there is a high degree of access to employment opportunities for its residents. The Census ACS 2014-2018 data indicates 56 percent of Burbank resident workers 16 years and over that do not work at home commute less than 30 minutes to work as compared to 49 percent of countywide worker. While Burbank has good access to job opportunities and is considered jobs-rich, it still needs more housing at varied income levels to balance the number of jobs. Exhibit B-14 also illustrates that from a regional perspective, areas that are highlighted in red with an index score of less than 20 are located in Los Angeles City communities of Highland Park/El Sereno (southeast of Glendale), Sunland/Tujunga (north of Burbank), and Pacoima/Panorama City/Van Nuys in eastern San Fernando Valley, including the City of San Fernando.

Economic opportunity indicators based on the HUD indices presented in Table B-6 include low poverty, labor market engagement, and jobs proximity. The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. A high score indicates less exposure to poverty in a neighborhood. The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood, based on the level of employment, labor force participation, and educational attainment in a census tract. Higher scores indicate higher labor force participation and human capital in a neighborhood. The third economic opportunity indicator is jobs proximity, which quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/Core-Based Statistical Area (CBSA), with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

Table B-6 shows that the index values for the three economic opportunity indicators are significantly higher for Burbank residents than for those in the Los Angeles-Long Beach-Anaheim region. This applies to all race and ethnic groups of the total population and the population below the federal poverty line. The difference between Burbank and the region is most evident by the job proximity indicator. For the total population of Burbank, the job proximity index is about 96 for all race/ethnic groups, which indicates the presence of large employment centers in close proximity to residential neighborhoods, and that job proximity appears not to be tied to race and ethnicity. In comparison, the regional job proximity scores range from 41 (non-Hispanic Blacks) to 55 (non-Hispanic Whites). The labor market indicator (labor force participation and human capital) shows that while the index value for non-Hispanic Whites is higher than the region, the gap is relatively small -- 69 for Burbank and 67 for the region. However, the difference between Burbank and the region is more pronounced for the minority groups, and especially for the population in poverty.

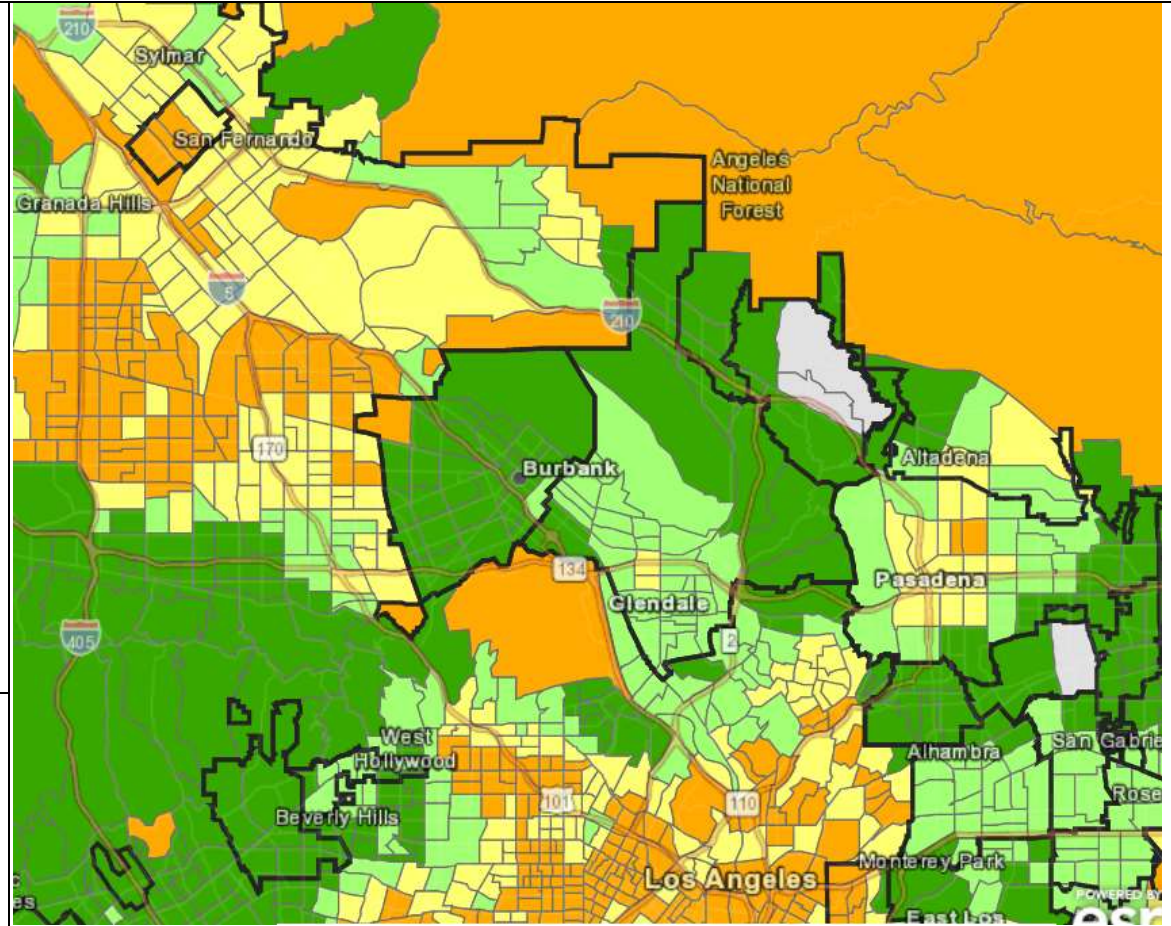
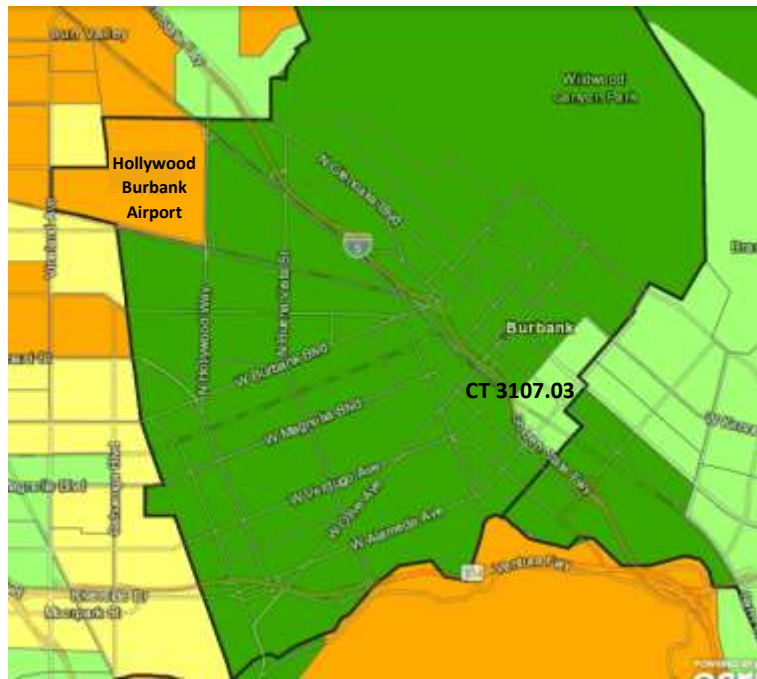
With an educated labor force, a network of efficient public transit, and an established entertainment industry, Burbank will continue to attract employment-generating businesses to the City as evident by the recent approval of major commercial projects.

Transportation

The availability of efficient, accessible, and affordable transit is critical to the social and economic well-being of Burbank residents, especial to lower-income households that must use public transit to commute to work, and the elderly and persons with disabilities that require transportation to medical and other public social services, as well as for routine activities such as shopping. Currently, Burbank residents have access to the local and regional bus and rail transit systems within the City and to other parts of the region. The City is served by Burbank Bus, a commuter-oriented service that provides local connections to regional Metrolink rail service. In addition to Burbank Bus, Los Angeles County Metropolitan Transportation Authority (MTA) operates a number of bus routes that serve local destinations. Other important bus service providers include the City of Glendale Beeline, Los Angeles Department of Transportation Commuter Express Service, and Santa Clarita Transit. In addition, Burbank is located along the proposed California High Speed Rail Corridor, with a station proposed adjacent to the Hollywood Burbank Airport.






The Southern California Association of Governments (SCAG) developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. Exhibit B-15 shows that most of Burbank is located within an HQTA. Additionally, all of the opportunity sites, entitled projects, and pending entitlement projects identified in the Housing Element site inventory are an HQTA. The HQTA graphically shows Burbank's transit connects and options throughout the City and the rest of the region.

Exhibit B-12
Access to Educational Opportunities



(R) TCAC Opportunity Areas (2021) - Education Score - Tract

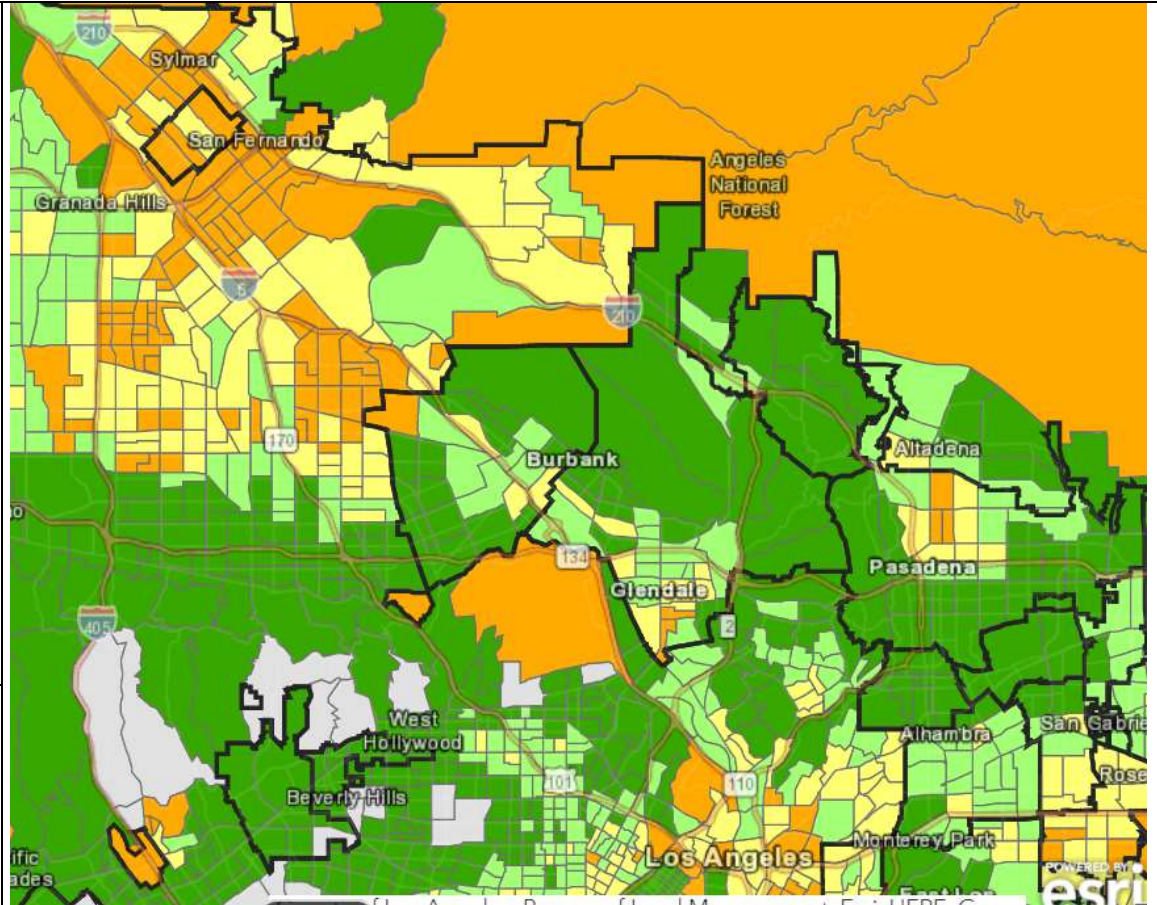
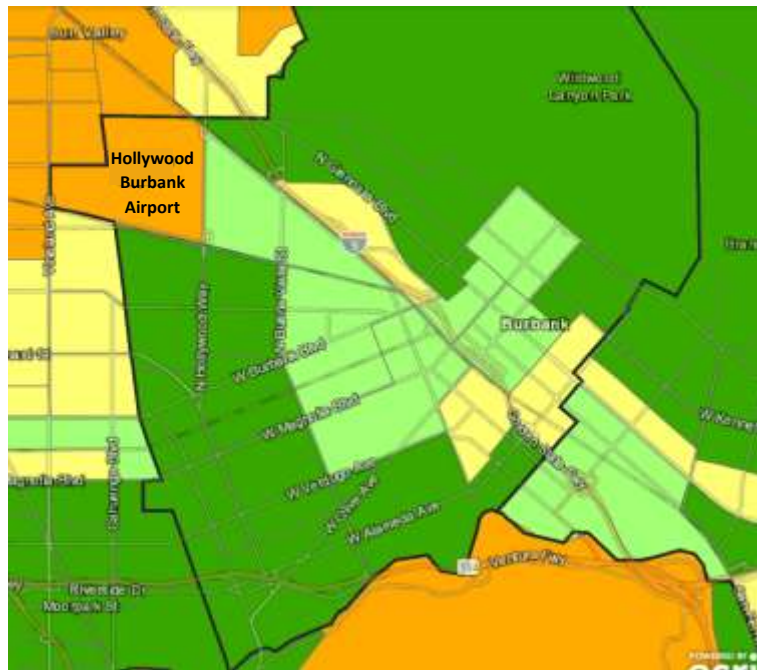
Education Domain Score (by region)

-  No Data
-  > 0.75 (More Positive Education Outcomes)
-  0.50 - 0.75
-  0.25 - 0.50
-  < 0.25 (Less Positive Education Outcomes)

Source: HCD AFFH Data Viewer (2021)






<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Exhibit B-13
Access to Economic Opportunities



(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

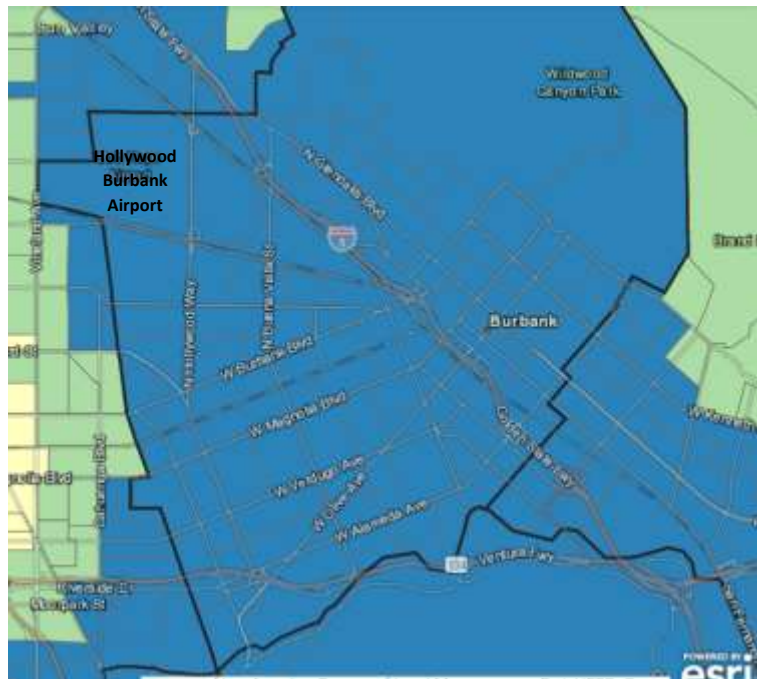
Economic Domain Score (by region)

-  No Data
-  > 0.75 (More Positive Economic Outcome)
-  0.50 - 0.75
-  0.25 - 0.50
-  < 0.25 (Less Positive Economic Outcome)

Source: HCD AFFH Data Viewer (2021)






<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

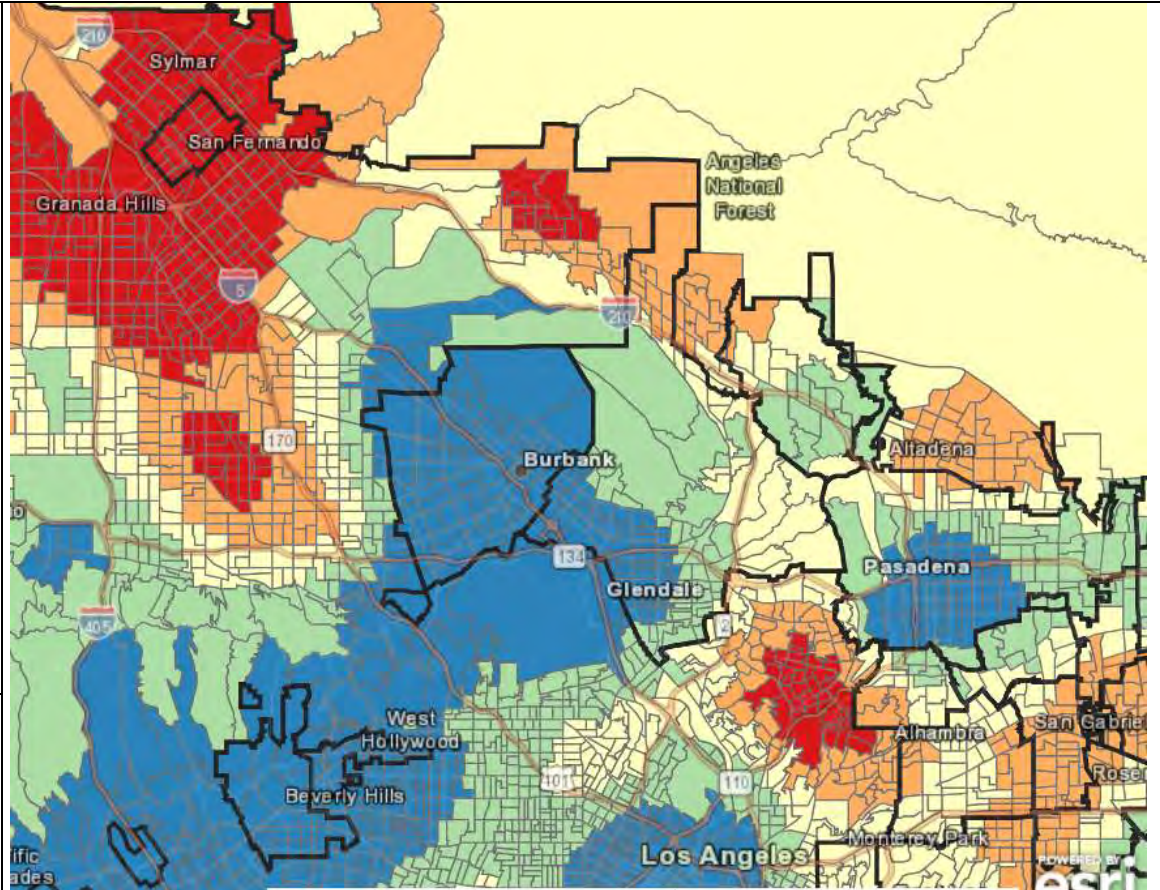
Exhibit B-14
Job Proximity



(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

Index Score

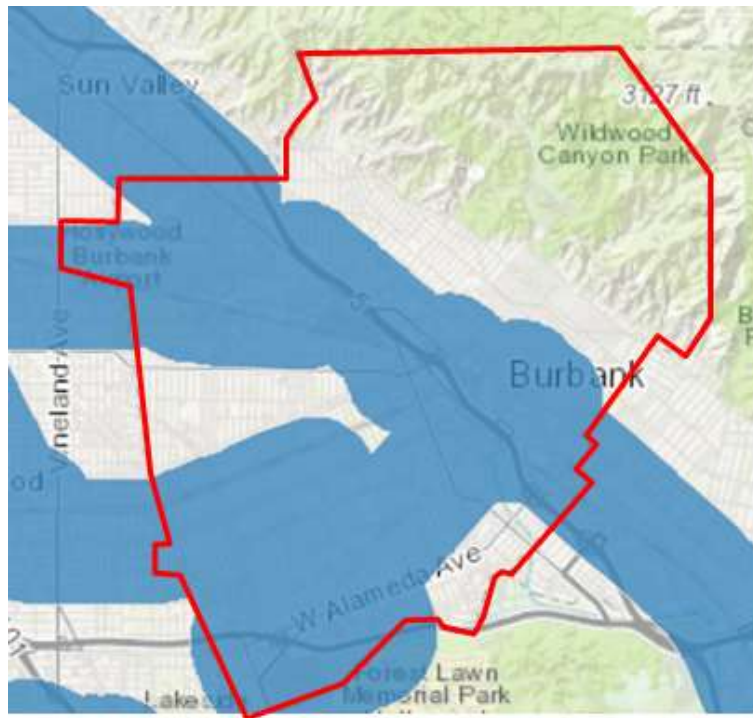
-  > 80 (Closest Proximity)
-  60 - 80
-  40 - 60
-  20 - 40
-  < 20 (Furthest Proximity)





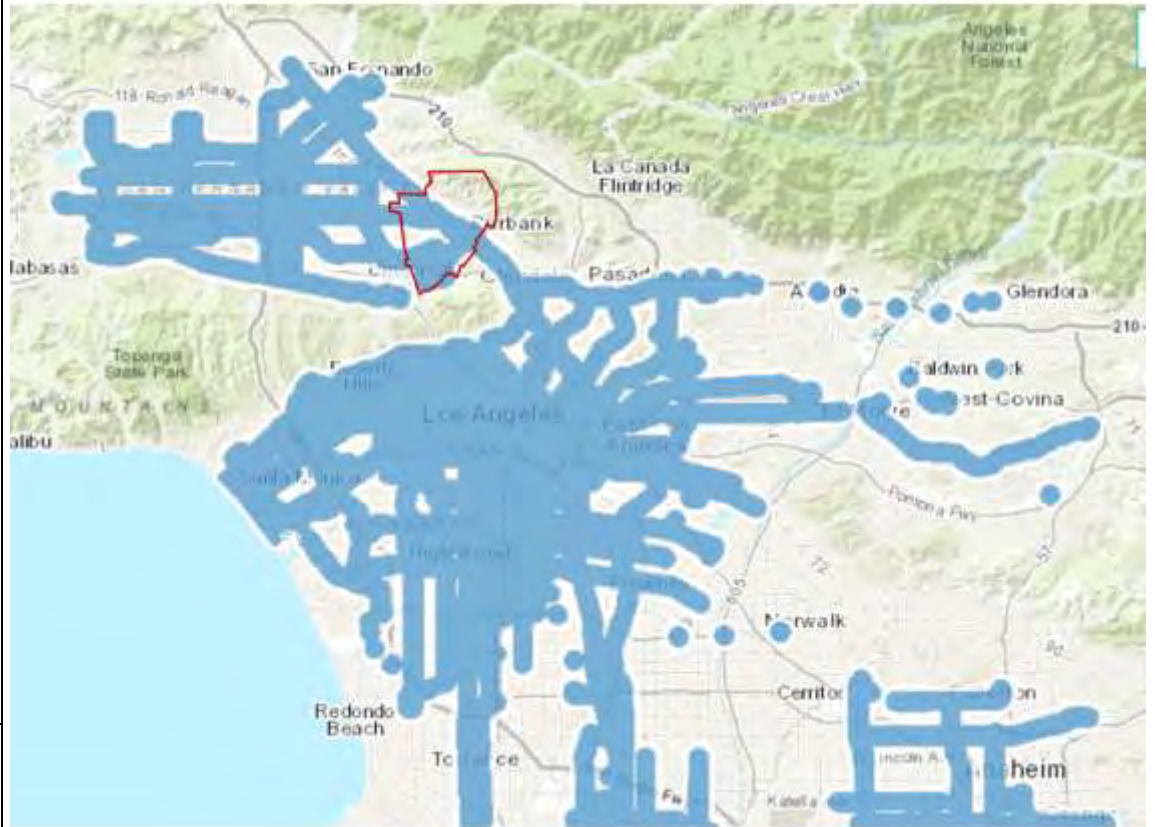
Source: HCD AFFH Data Viewer (ACS 2014-2017)

<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Exhibit B-15
High Quality Transit Area

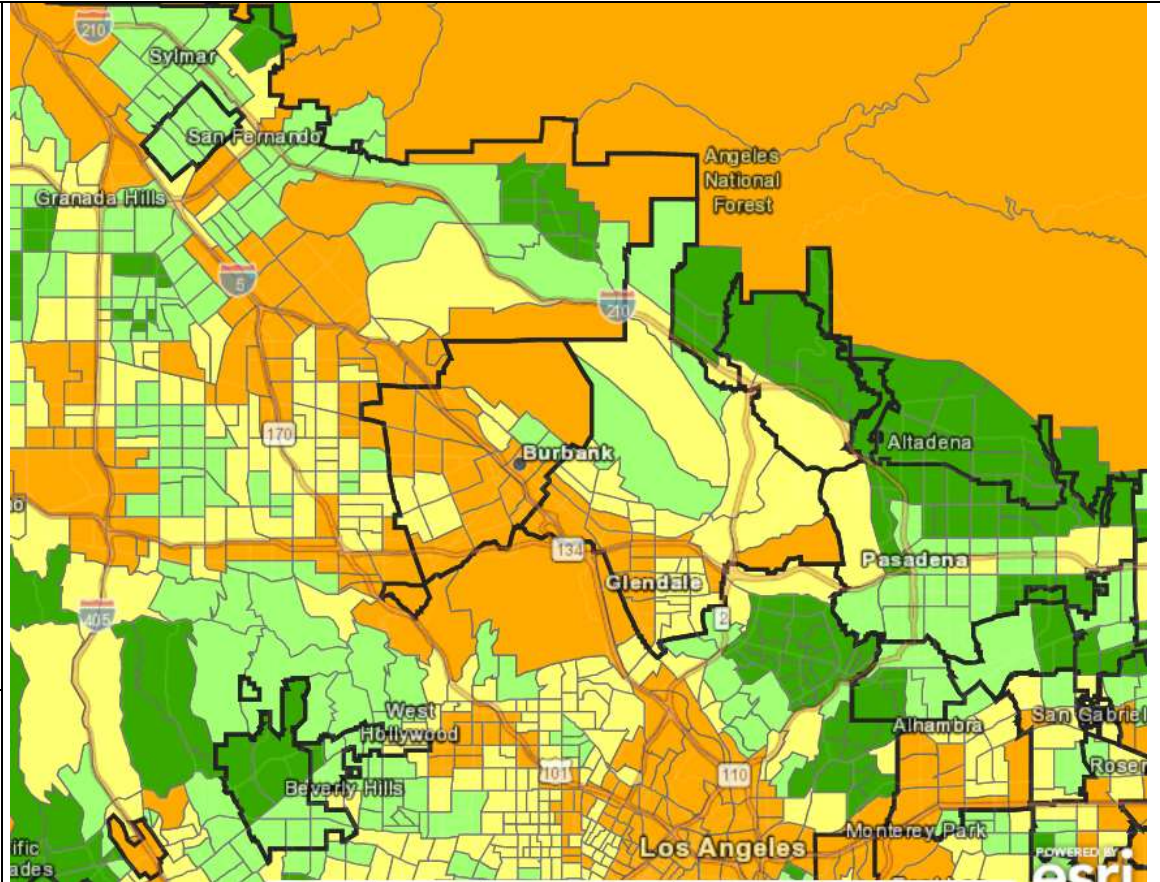
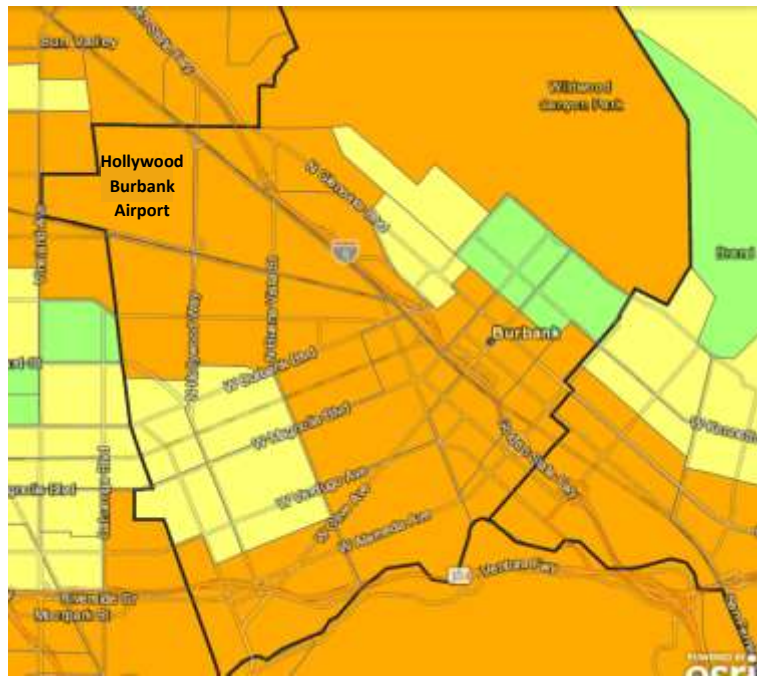


-  Burbank
-  High Quality Transit Area








Source: SCAG (2016)
https://gisdatascaq.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0/explorer?location=34.056609%2C-118.278249%2C10.00

Exhibit B-16
Environmental Opportunities



(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

Environmental Domain Score

-  No Data
-  .75 - 1 (More Positive Environmental Outcomes)
-  .50 - .75
-  .25 - .50
-  < .25 (Less Positive Environmental Outcomes)

Source: HCD AFFH Data Viewer (2021)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

The HUD-based transportation opportunity indicators shown in Table B-6 include transit trips and low transportation cost. The transit trip index is based on estimates of transit trips taken by a family that meets the following description: a three-person, single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the transit trips index, the more likely residents in that neighborhood utilize public transit. The low transportation cost index is based on estimates of transportation costs for a family that meets the following description: a three-person, single-parent family with income at 50 percent of the median income for renters for the region/CBSA. Therefore, the higher the index, the lower the cost of transportation in that neighborhood.

Similar to other opportunity indicators, transit trips and low transportation cost index values are higher for Burbank residents than residents of the Los Angeles-Long Beach-Anaheim region. All residents of Burbank have very high access to public transit and low transportation costs with index values in the 90s and 80s, respectively. At the regional level, scores are 70/80s for access to transit and the 70s for lower transportation cost. Another pattern is that minority residents tend to have slightly higher values than non-Hispanic Whites for both Burbank and the region.

While Burbank residents overall tend to have higher transit use and lower transportation costs than the rest of the region, female-headed households with children, the elderly, persons with disabilities, and those with incomes below the poverty level need even more public transit. These groups of residents are concentrated in the following census tracts: female-headed household with children (CT 3118.02); the elderly (CTs 3107.01 and 3107.02); persons with disabilities (CT 3107.01); and, residents in poverty (CT 3107.03). All of the identified census tracts are located along the I-5 corridor in the southeastern portion of Burbank. All four census tracts are located within the High Quality Transit Area and are serviced by various local and regional bus transit lines. But, for more curb-to-curb transportation service for Burbank's seniors and persons with disabilities, there is the BurbankBus Senior and Disabled (BBS&D) Transit that allows these residents to maintain healthy and active lifestyles. To be eligible for the BBS&D Transit service, Burbank residents must be 60 years of age or older or qualify by nature of a disability. In addition, MTA has a new on-demand rideshare service known as Metro Micro, which offer trips within several zones in LA County, including the North Hollywood/Burbank service zone. All four of the above mentioned census tracts are within this service zone. This rideshare service is for short local trips and uses small vehicles (seating up to 10 passengers). The Metro Micro service is meant to be a fast, safe and convenient option for quick trips around town.

MTA is also preparing the plans for the North Hollywood to Pasadena Bus Rapid Transit (NoHo-Pasadena BRT) Project. The 18-mile high-quality regional transit project will connect the Metro North Hollywood Red Line Station, the Burbank Media District, Downtown Burbank, Glendale, Eagle Rock, and Pasadena. A bus rapid transit is a bus corridor that operates like a light rail line, and includes rail-like stations, frequent bus service, and roadway improvements to include bus lanes and traffic signal priority that allows the bus to bypass congestion. This transit line traverses or is in close proximity to the four census tracts (CTs 3107.01, 3107.02, 3107.03, and 3118.02).

Environment

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening tool (known as CalEnviroScreen 3.0) to identify communities disproportionately burdened by multiple sources of pollution and with population characteristics that make them more sensitive to pollution. The CalEnviroScreen 3.0 was used in the TCAC/HCD AFFH Data Viewer map shown in Exhibit B-16 to measure environmental opportunities within Burbank and the region. Low scoring census tracts (less than 0.25) tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status, and high scoring census

tracts (0.75 to 1.0) having more positive environmental outcomes. Overall, the majority of Burbank census tracts score in the low range, with two census tract (CT 3102.01 and CT 3102.02) in the northeast portion of the City along the Verdugo Mountain foothills having moderate high scores (0.50-0.75). From a regional perspective, more positive environment outcomes occur away from Burbank, closer to areas along the foothills of the San Gabriel Mountains and Santa Monica Mountains, area southeast of Glendale, and areas of northeastern San Fernando Valley.

Senate Bill 1000 (SB 1000) requires cities with identified disadvantaged communities to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities throughout the state. The model scores each of the indicators using percentiles and combines the scores for individual indicators to determine an overall CalEnviroScreen score for a given census tract relative to others in the state. As shown in Exhibit B-17, there are a total of five census tracts identified as disadvantaged communities: two census tracts (CTs 3105.01 and 3106.01) in Burbank identified as disadvantaged communities, located along the I-5 northeast of Burbank Boulevard; and three census tracts (CTs 3107.03, 3118.01, and 3118.02) also along the I-5 in southeast Burbank at the border with Glendale. As mandated under SB 1000, the City of Burbank is updating the Safety Element and other General Plan Elements in conjunction with the Housing Element to include policies to address environmental justice through reducing health risks to disadvantaged communities, promoting civil engagement, and prioritizing the needs of these communities.

Disproportionate Housing Needs and Displacement Risk

Overpayment

Housing affordability problems occur when housing costs become so high in relation to income that households are faced with paying an excessive portion of their income for housing, leaving less income remaining for other basic essentials. Housing overpayment occurs when a household spends more than 30 percent of its income on housing costs; severe overpayment refers to spending more than 50 percent of income on housing.

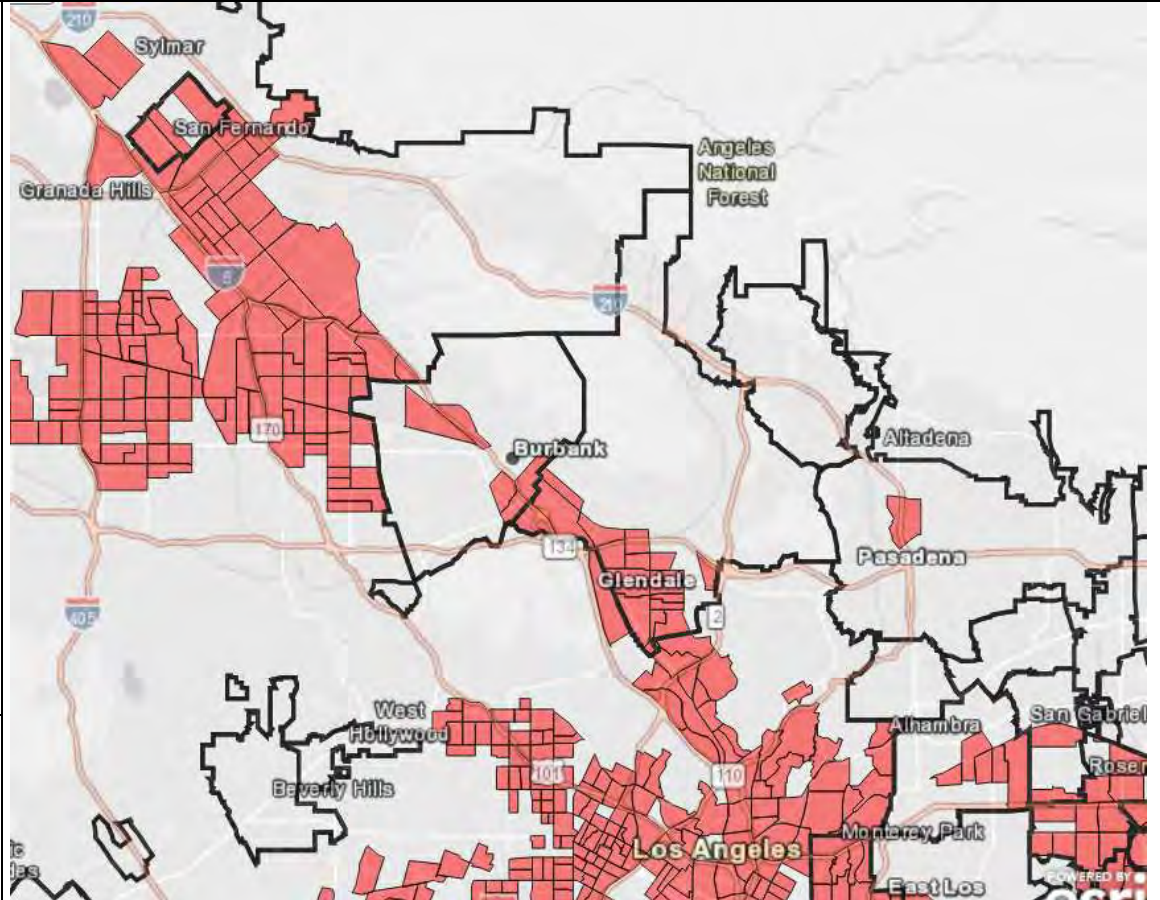
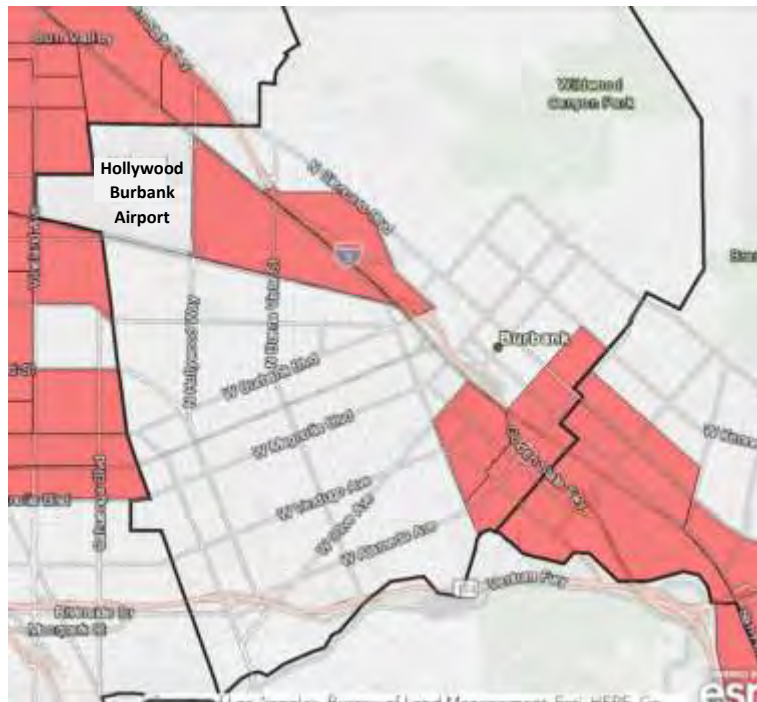
As presented in Table B-7, the majority (56%) of total renter households in Burbank pay more than 30 percent of their income on housing costs, which is slightly less than the 58 percent countywide. Almost one-third (31%) of renter households are severely cost burdened and paying more than 50 percent of their income on housing costs, which is about the same rate as the County.

Overpayment	Burbank		Los Angeles Co.
	Households	Percent	Percent
Renters			
Overpayment (30%-50% Household Income)	5,861	25.3%	27.3%
Severe Overpayment (>50% Household Income)	7,207	31.1%	31.0%
Total Overpayment-Renters (>30% Household Income)	13,068	56.4%	58.3%
Owners*			
Overpayment (>30%-50% Household Income)	3,053	17.6%	19.8%
Severe Overpayment >50% Household Income	2,403	13.9%	16.6%
Total Overpayment- Owners (>30% Household Income)	5,456	31.5%	36.3%

Source: ACS 2014-2018 (B25091)

*Owner household includes with and without mortgage

Exhibit B-17
Disadvantaged Communities



City/Town Boundaries



(A) SB 535 Disadvantaged Communities



Source: HCD AFFH Data Viewer (2021)

<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

As shown in Table B-8 overpayment is most pronounced among lower income renter households. A significant majority of renter households earning less than \$50,000 in Burbank face either overpayment or severe overpayment, and the highest percentage (95%) of overpayment are renter household in the \$20,000 to \$34,999 income range. Therefore, the impact of housing overpayment on Burbank’s lower income households is significant, with the community’s special needs populations – seniors, persons with disabilities, and female-headed households with children – being the most vulnerable to losing their housing due to an inability to pay. For these reasons, housing overpayment is considered a significant issue in Burbank.

Table B-8
Renter Overpayment by Income 2018

Income Level	Overpayment (30-50% HH Income)		Severe Overpayment (>50% HH Income)		Total (>30% HH Income)	
	Households	% Renter Income Level	Households	% Renter Income Level	Households	% Renter Income Level
Less than \$20,000	579	13.1%	3,571	80.6%	4,150	90.7%
\$20,000-\$34,999	593	19.0%	2,374	75.9%	2,967	94.9%
\$35,000 to \$49,999	1,724	58.1%	854	28.8%	2,578	86.9%
\$50,000 to \$74,999	1,809	47.0%	408	10.6%	2,217	57.6%
\$75,000 to \$99,999	825	26.7%	0	0	825	26.7%
\$100,000 or more	331	5.8%	0	0	331	5.8%
Total	5,861	25.3%	7,207	31.1%	13,068	56.4%

Source: SCAG Pre-Certified Local Housing Data, August 2020; ACS 2014-2018.

Overcrowding

The State defines an overcrowded housing unit as one occupied by more than 1.0 person per room (excluding kitchen, porches, and hallways). A unit with more than 1.5 occupants per room is considered severely overcrowded. The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units.

Housing overcrowding impacts Burbank renters more than homeowners in the City. Of the total renter households in the City, seven percent were living in overcrowded conditions (more than 1 person per room), while only two percent of total owner households were living under these conditions. Burbank’s overcrowding percentages were one-half those of Los Angeles County (17% for renters and 6% for owners).

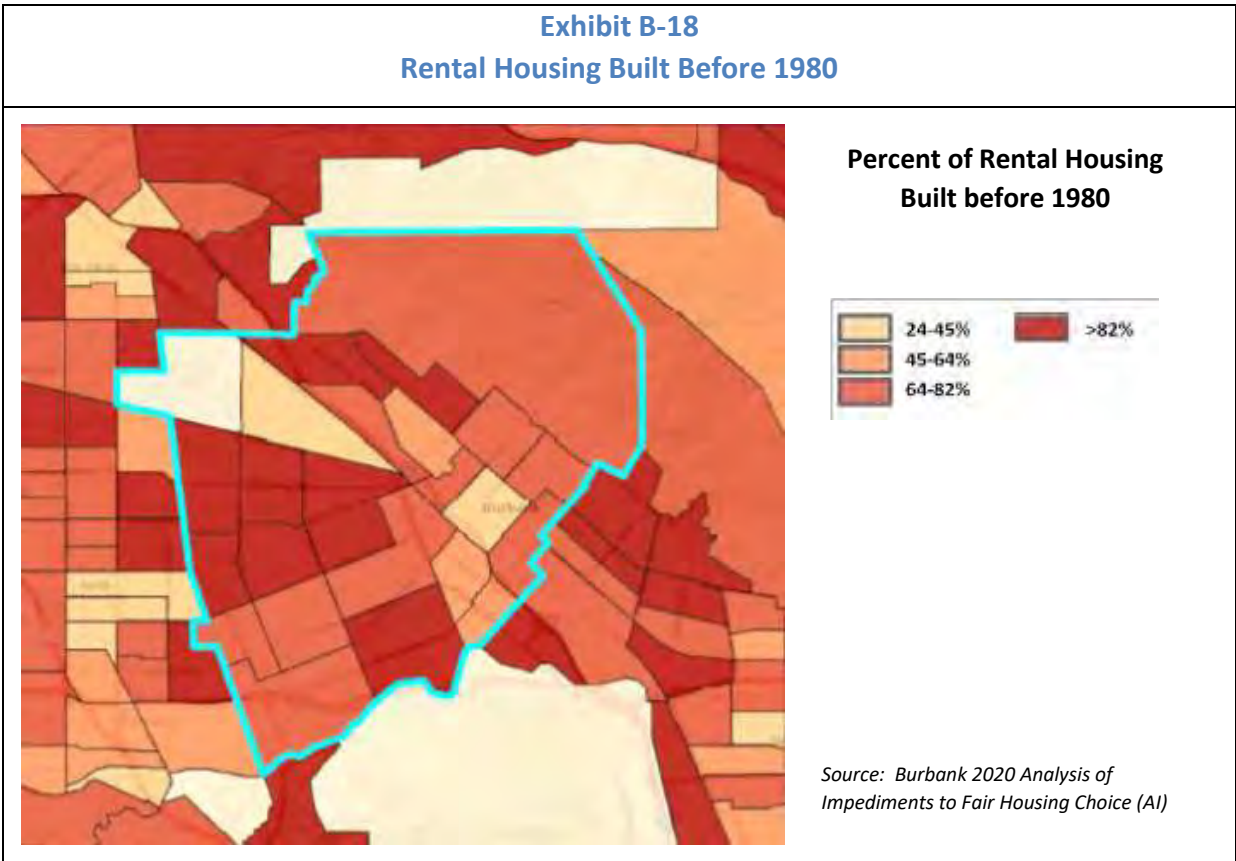
While overcrowding in general is not considered a significant housing issue in Burbank, there is a disparity in the supply and demand for large rental units among lower income households, with 940 lower-income large family renter households and only 590 adequately sized and affordable units. This imbalance between supply and demand contributes to nearly one-fifth of the City’s renter households residing in overcrowded conditions, and demonstrates the need for larger apartment units consisting of three or more bedrooms.

Housing Conditions

For many low-income families, substandard housing is the only housing available at an affordable price. One indicator of substandard housing is the age of a City’s housing stock. The age of housing is commonly used by State and federal agencies as a factor in estimating rehabilitation needs. Typically, most homes begin to require major repairs or have significant rehabilitation needs at 30 to 40 years of age. In addition, housing built prior to 1980 may have lead paint, asbestos, and other hazardous materials, which are now banned in the construction of homes. Also, since the Sylmar Earthquake of 1971, stringent seismic safety standards were developed to ensure that structures could withstand seismic activity of similar magnitude.

According to the Census ACS 2014-2018 data, approximately three-quarters (74%) of Burbank’s housing stock consists of units built before 1980. In comparison, the age of Los Angeles County’s housing stock is similar to Burbank, with 75 percent of its housing units built prior to 1980.

As shown in Exhibit B-18, rental housing built before 1980 is located in the darkest shaded areas, which include census tracts located in: western Burbank south of the Hollywood Burbank Airport and Vanowen Street; northwest Burbank north of the I-5 Freeway; and in the vicinity of the southeast boundaries of the City. As previously shown in Exhibit B-3: TCAC/HCD Opportunity Areas, these census tracts are identified as “highest” or “high” areas of resources and opportunities and relatively “low” areas of poverty. However, it is of interest for the City to monitor all housing built prior to 1980 for lead paint and other hazardous or structurally unsafe housing issues.



Another measure of substandard housing condition in a jurisdiction is the lack of adequate plumbing and kitchen facilities in a housing unit. Estimates from the Census ACS 2014-2018 data shows that only 62 occupied housing units in Burbank lacked complete plumbing facilities or 0.1 percent of the total occupied units in the City. There were more units lacking complete kitchen facilities, with 532 units or 1.3 percent of the City's total occupied units. At the countywide level, estimates were higher than Burbank in both cases. According to the Census estimates, 0.5 percent of the County's total occupied housing units lacked complete plumbing facilities and 1.5 percent lacked complete kitchen facilities.

Severe Housing Problems

Exhibit B-19 shows the percentage of households experiencing any one of four severe housing problems (lack of complete plumbing, lack of complete kitchen, severe over-crowding, and severe cost-burden). The exhibit shows Burbank and other nearby cities and unincorporated communities were in the 20-40 percent range of households facing a severe housing problem. For Burbank, 27 percent of households faced severe housing problems. Other areas that experienced higher percentages than Burbank included the Cities of San Fernando (39%), Los Angeles (37%), and Glendale (36%), while the City of Pasadena was the same as Burbank. Cities with lower percentages than Burbank include the Cities of South Pasadena (20%), San Marino (20%), La Canada-Flintridge (19%). The highest percentage in the area was the unincorporated community of East Los Angeles at 40 percent.

Homelessness

According the 2020 Greater Los Angeles Homeless Count released by the Los Angeles Homeless Services Authority (LAHSA), the January 2020 "point in time" count enumerated 66,439 homeless individuals in Los Angeles County, reflecting an increase of 13 percent over the previous 2019 count. Other Southern California counties have experienced even higher increases in homelessness between 2019 and 2020, with Kern at 19 percent and San Bernardino at 20 percent. Only San Diego County witnessed a decrease in homelessness of minus six percent. Within Los Angeles County, the largest number of homeless were counted in Metro Los Angeles (Service Planning Area 4), which includes the Los Angeles City downtown area and its vicinity, with a count of 17,121 or 26 percent of the countywide homeless total. San Fernando Valley (Service Planning Area 2), which includes the City of Burbank, had a count of 9,274 homeless or 14 percent of the countywide homeless total.

A closer look at LAHSA's homeless data indicate that in Los Angeles County, about one-quarter of homeless families were sheltered and about three-quarters unsheltered. Between 2019 and 2020, the number of homeless families increased by 46 percent. The demographic data also indicate that the homeless population in Los Angeles County is mostly Hispanic/Latino at 36 percent, then Black/African American at 34 percent, followed by White at 26 percent. Asian/Pacific Islanders represent only 1.5 percent of the countywide homeless population. Of the racial/ethnic groups, Black/African Americans are disproportionately represented. This group represents 34 percent of the total homeless, while only accounting for eight percent of the total county population. The Hispanic/Latino's share of the total county population is 49 percent and White's 26 percent.

Other LAHSA 2020 homeless data for Los Angeles County show:

- 6,290 homeless seniors (62+), accounting for nine percent of the total county homeless -- an increase of 20 percent since 2019.
- 19 percent increase of transitional age youth households and unaccompanied minors in one year.
- 54 percent increase in chronic homelessness in one year (HUD defines chronic as homeless for more than one year and has a disabling condition).

- Two-thirds of people experiencing homelessness identify as male.
- One half of unsheltered cisgender females (18+) have a history of domestic, intimate partner and other sexual violence.
- 59 percent of newly homeless cite economic hardship as the main reason for their homelessness.

Within Burbank, LAHSA's 2020 point in time count identified a total of 291 homeless individuals (207 unsheltered and 84 sheltered homeless), an increase of only three percent from the previous year, but almost doubling since 2016. The City's sheltered homeless included the following: 65 individuals in transitional housing; 19 individuals in the emergency shelter who reported they were from Burbank; 47 persons living in the street; 146 homeless persons living in a car, van, or RV/camper; and nine persons living in a makeshift shelter.

Demographic information provided for the San Fernando Valley (Service Planning Area 2) shows that three-fourths of the homeless population are individuals and not in a family household. About one third of total homeless persons identify as female. Six percent of the total homeless in San Fernando Valley are seniors (62+). Also, the homeless identifying as Hispanic/Latino account for 43 percent of the total homeless population in San Fernando Valley, which is followed by Whites at 30 percent and Black/African Americans at 22 percent.

Working together with local, County, and City of Los Angeles partners, the City of Burbank adopted a comprehensive Homeless Plan for 2011-2021, scheduled to be updated in spring of 2022. The Homeless Plan provides a proactive approach to homelessness by: 1) creating action-oriented solutions that address the ongoing systemic social issues of homelessness impacting our community; 2) coordinating efforts to address homelessness with City Departments, public and private entities, businesses, and community involvement; and 3) identifying funding, barriers, and measurable outcomes.

As previously discussed in Housing Element's Special Needs Populations of the Housing Needs Assessment, there are numerous agencies and organizations that are currently providing programs and services to help the homeless in Burbank. Examples of a few of the homeless resources include:

- Burbank Housing Corporation (BHC), in partnership with service providers including Family Services Agency (FSA) and Family Promise of the Verdugos, owns and operates five transitional/supportive housing facilities within Burbank.
- Burbank Housing Authority (BHA) and the Los Angeles Homeless Services Authority offer a form of tenant-based rental assistance to chronically homeless individuals and families.
- Burbank Temporary Aid Center (BTAC) administers a motel voucher program for homeless individuals and families to stay at local motels.
- Family Promise of the Verdugos provides temporary shelter and supportive services to families that are "situationally" homeless.
- Ascencia Emergency Housing provides Burbank homeless with 60-90 days of emergency and transitional housing and permanent supportive housing.
- Street Plus - Downtown Burbank Hospitality and Social Outreach Ambassador Program dedicated to homeless outreach in downtown Burbank by providing homeless individuals receive housing, housing support, or transportation back to their families.
- Safe Storage and Help Center (SAFE) was completed in August 2021. The Salvation Army assists homeless individuals with safely storing their personal belongings at the center while also providing case management and referrals to services.

A complete list of homeless resources and additional information are included in the Housing Element's Special Needs Populations section and on the City of Burbank website.

Displacement Risk

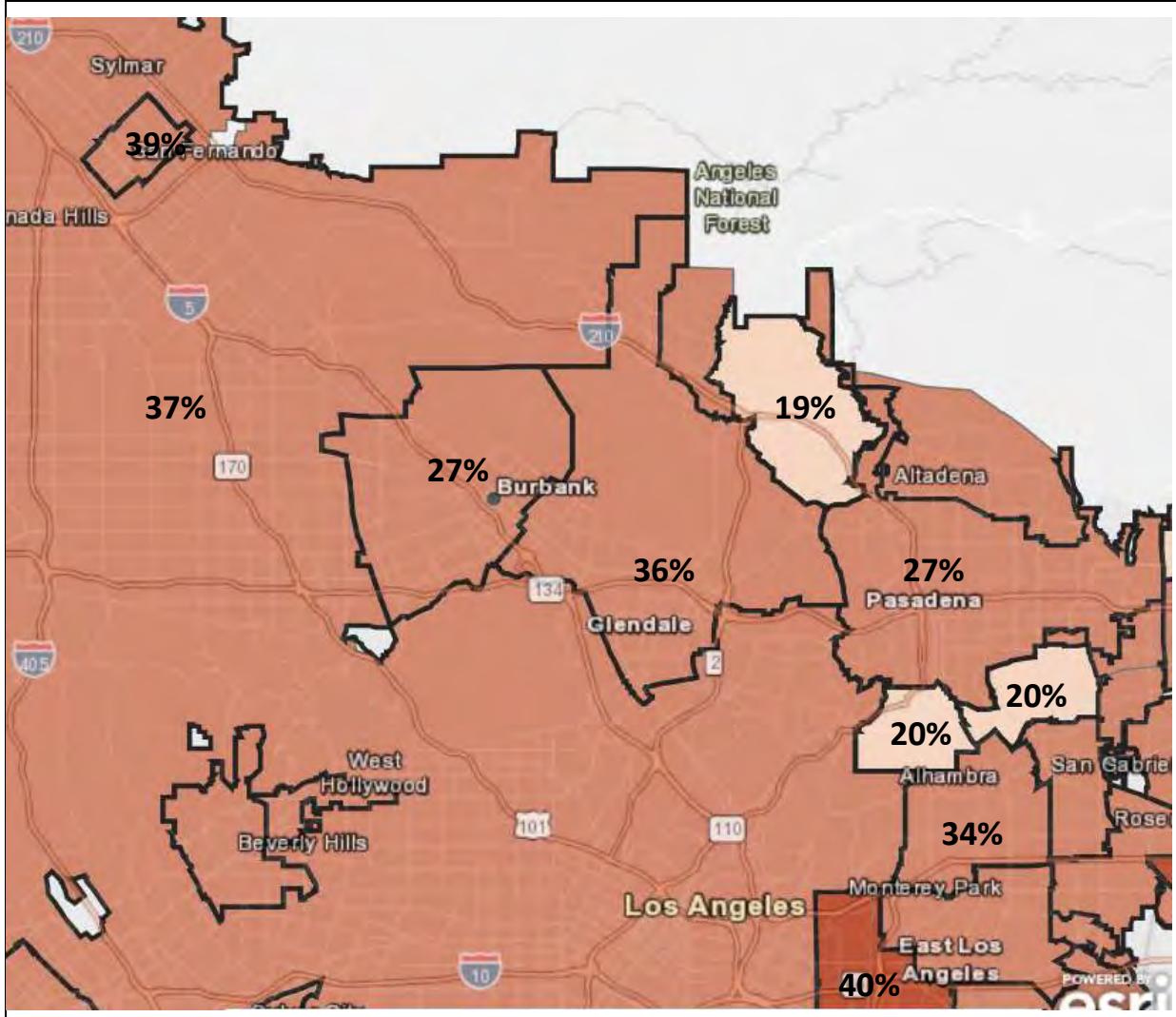
There are no affordable units currently at-risk of converting to market-rate within the 2021-2029 planning period. The three projects identified as at-risk in the City's 2014-2021 Housing Element included Pacific Manor, Wesley Tower, and Harvard Plaza. All three have extended their affordability requirements beyond the 2021-2029 planning period.

A mapping tool developed by the UCLA Urban Displacement Project using 2018 Census ACS data provides stakeholder a better understand where neighborhoods are changing and are vulnerable to gentrification and displacement in Los Angeles, Orange, and San Diego Counties⁶. As illustrated in Exhibit B-20, a vast majority of Burbank census tracts are identified as Stable Moderate/Mixed Income. However, areas most susceptible to displacement include three connecting census tracts (CT 3107.01, CT 3107.02, and CT 3107.03) located southeast of Burbank Boulevard in downtown Burbank to the border with the City of Glendale. These census tracts are identified as Low-Income/Susceptible to Displacement or Ongoing Displacement of Low-Income Households and are mostly lower-income areas or have experienced an absolute loss of low-income households between 2000 and 2018. With a strong housing market for both owner homes and rental units in Burbank and a shortage of housing statewide, the average apartment rent in Burbank have increased by 40 percent since 2013. The information on rents in Burbank is based on surveys conducted in 2013 and 2020. As a result, many lower income households have been priced out of the ownership and rental housing market and must look elsewhere for housing. Also, the majority of lower income renters face overpayment. The burden of higher housing cost is supported by data from the Census ACS 2015-2019 estimates that show CT 3107.02 and CT 3107.3 continue to have the highest proportion of cost-burdened renters in the City (more than 30% of household income going towards housing). At the other end of the scale are three census tracts: CT 3111 located south of the Hollywood Burbank Airport is designated Becoming Exclusive; and CT 3101 and CT 3103 in the northern part of the City are designated Stable/Advance Exclusive. The location of the census tracts and the criteria used to define the designations are presented in Exhibit B-20.

While most of Burbank is stable with moderate and mix income, the areas immediately to the west of the City and portions of southern Glendale are susceptible to displacement and gentrification. At the county level, the UCLA Urban Displacement Project data show Los Angeles County exhibiting the highest rates of gentrification among the three counties of Southern California, with 10 percent of census tracts classified as At Risk of Gentrification, Early/Ongoing Gentrification, or Advanced Gentrification. In addition, five percent of census tracts in Los Angeles County are not gentrifying but experiencing Ongoing Displacement of Low-Income Households.

⁶ UCLA Urban Displacement Project, <https://www.urbandisplacement.org/los-angeles/los-angeles-gentrification-and-displacement>

**Exhibit B-19
Severe Housing Problems**



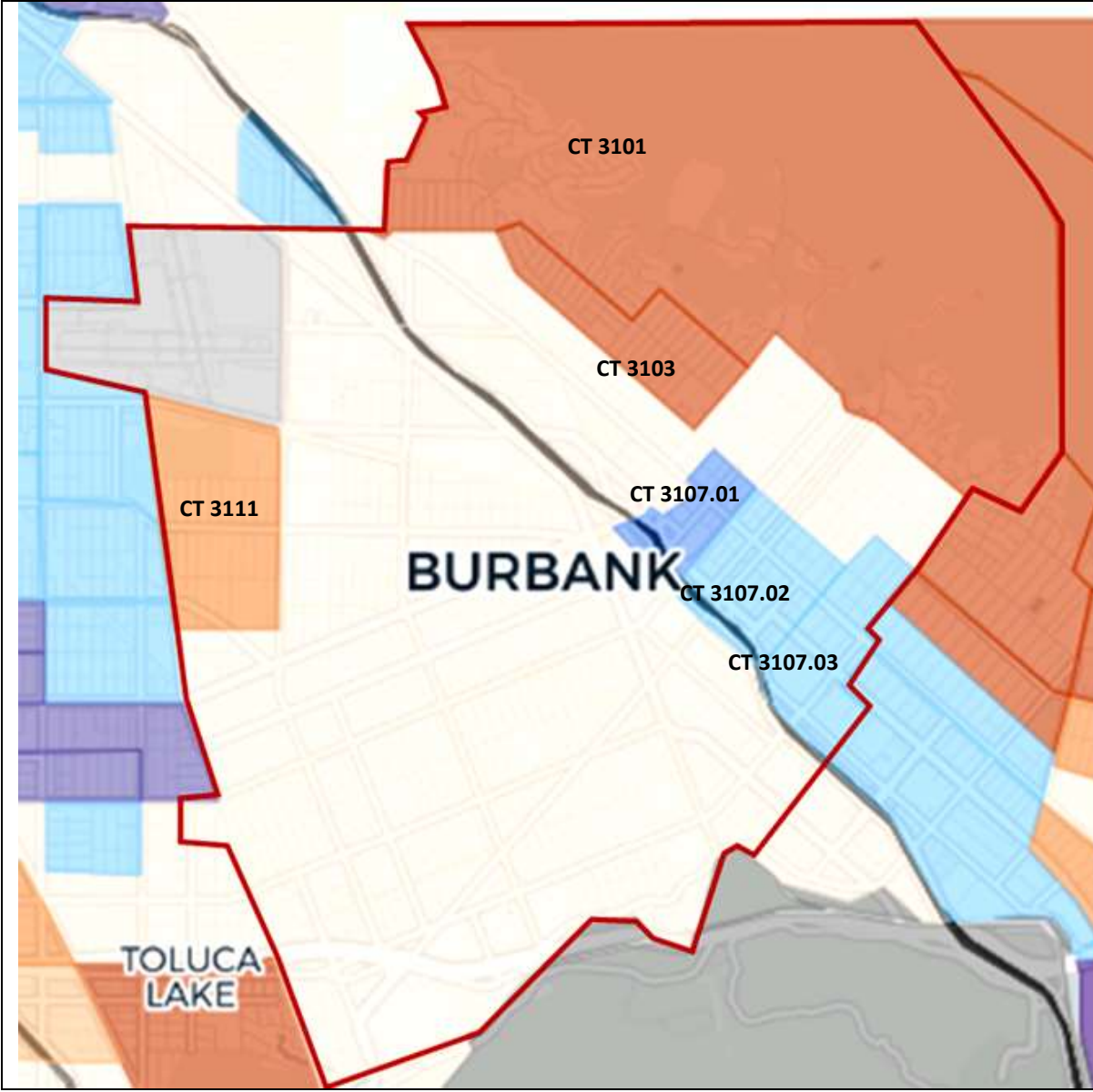
(A) Percent of all households with any of the 4 severe housing problems (lacks complete kitchen, lacks complete plumbing, severely overcrowded, severely cost-burdened) - (ACS, CHAS) - City Level

Percent of all households with any of the 4 severe housing problems



Source: HCD AFFH Data Viewer (HUD CHAS 2014-2018)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

**Exhibit B-20
Displacement Risk**



MODIFIED TYPES	CRITERIA
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	<ul style="list-style-type: none"> • Low or mixed low-income tract in 2018
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	<ul style="list-style-type: none"> • Low or mixed low-income tract in 2018 • Absolute loss of low-income households, 2000-2018
EARLY/ONGOING GENTRIFICATION	<ul style="list-style-type: none"> • Low-income or mixed low-income tract in 2018 • Housing affordable to low or mixed low-income households in 2018 • Didn't gentrify 1990-2000 OR 2000-2018 • Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018 • Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap
EARLY/ONGOING GENTRIFICATION	<ul style="list-style-type: none"> • Low-income or mixed low-income tract in 2018 • Housing affordable to moderate or mixed moderate-income households in 2018 • Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018 • Gentrified in 1990-2000 or 2000-2018
ADVANCED GENTRIFICATION	<ul style="list-style-type: none"> • Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs • Gentrified in 1990-2000 or 2000-2018
STABLE MODERATE/MIXED INCOME	<ul style="list-style-type: none"> • Moderate, mixed moderate, mixed high, or high-income tract in 2018
STABLE MODERATE/MIXED INCOME	<ul style="list-style-type: none"> • Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change or increase in housing costs
STABLE MODERATE/MIXED INCOME	<ul style="list-style-type: none"> • Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Rapid increase in housing costs • Absolute loss of low-income households, 2000-2018 • Declining low-income in-migration rate, 2012-2018 • Median income higher in 2018 than in 2000
STABLE/ADVANCED EXCLUSIVE	<ul style="list-style-type: none"> • High-income tract in 2000 and 2018 • Affordable to high or mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs

Source: Urban Displacement Project, UC Berkeley (ACS 2014-2018)
<http://www.urbandisplacement.org/>

5. Summary of Housing Issues and Contributing Factors

The Burbank AI evaluated a wide range of housing issues and potential barriers to fair housing. In general, Burbank is becoming a more racial/ethnically diverse community and the evidence of segregation is low in comparison to Los Angeles County as defined by HUD. The City does not have an identified R/ECAP census tract. Furthermore, the City's census tracts are designated as highest or high opportunity areas under the TCAC/HCD Opportunity Areas, with the exception of two moderate opportunity census tracts located in the southeastern portion of the City. Most of the City's residents have access and are in close proximity to local and regional transit, health care facilities, education, and other services. However, there are fair housing issues that still need to be addressed in the City. The following summarizes the key contributing factors or impediments to fair housing:

Housing Issues: Affordable housing of various types for Burbank's residents

- **Housing Cost Burden.** Of the total renter households in the City, 56 percent were paying over 30 percent of their total household income on housing. This compares to 58 percent countywide.
- **Large Households.** Disparity in the supply and demand for large rental units, especially among lower income households, with 940 lower-income large family renter households and only 590 adequately sized and affordable units. This imbalance between supply and demand contributes to nearly one-fifth of the City's renter households residing in overcrowded conditions, and demonstrates the need for larger apartment units consisting of three or more bedrooms.
- **Senior Population.** Seniors (65+ years) have experienced a steady proportional increase in population. As of 2018, 15 percent of Burbank residents are seniors as compared to 13 percent in 2000. The median age of Burbank residents in 2018 was 40 years as compared to 36 years for Los Angeles County residents. Senior citizens face housing needs related to housing maintenance, accessibility, and cost. Seniors also experience high housing cost burdens, with almost one-third of senior households overpaying (more than 30% of income) for housing.
- **Lower-Income Households.** Overpayment is most pronounced among lower income renter households. A significant majority of renter households earning less than \$50,000 in Burbank face either overpayment or severe overpayment.
- **Housing Cost.** Median rental rates in Burbank are beyond the level affordable to lower income (80 percent of AMI) households. A three-person low-income household can afford to pay up to \$1,423 in monthly rent (excluding utilities), whereas the median two-bedroom apartment rent in Burbank is \$1,685 -- an affordability gap of \$262. Moderate income (110 percent of AMI) households are still priced out of Burbank's homeownership market. The maximum affordable purchase price ranges from \$267,000 for a three-person household to \$300,900 for a four-person household, rendering both condominiums and single-family homes in Burbank beyond the reach of moderate-income households.
- **Displacement Risk.** Areas most susceptible to displacement include four census tracts (CT 3107.01, CT 3107.02, and CT 3107.03) within the City. These census tracts are identified as "Low-Income/Susceptible to Displacement" or "Ongoing Displacement" and are mostly lower-income areas where the increase in rents may cause a risk of displacement.

Housing Issues: Public education of fair housing services and fair housing rights

- **Racial/Ethnic Diversity.** Burbank is continuing to become more ethnically and racially diverse, which often brings changes in terms of different income levels, family types, and languages spoken. While the majority of Burbank's residents are non-Hispanic White (57%), the Hispanic (24%), Asian (12%), and Black (3%) populations are increasing in their proportion of the citywide total. In Los Angeles County, non-Hispanic White residents only account for 26 percent and Hispanics 26 percent. In addition, English proficiency may affect housing needs and opportunities, and the residents' understanding of their fair housing rights. Among people at least five years old living in Burbank between 2014 and 2018, 45 percent spoke a language other than English at home. Spanish was spoken by 17 percent of people at least five years old; 16 percent reported that they did not speak English "very well."

Housing Issues: Fair housing for the special needs population

- **Persons with Disabilities.** Approximately 11 percent of Burbank's population has some type of disability, encompassing physical, mental, and developmental disabilities. The living arrangements for persons with disabilities depends on the severity of the condition, and ranges from independent living to specialized care environments (group housing).
- **Housing for Persons with Physical Disabilities.** Special need groups experience a high incidence of discrimination complaints. Housing available for persons with physical disabilities continues to be the top discrimination complaint in Burbank, which is consistent with other areas in Los Angeles served by the HRC. In addition, there are discriminatory complaints pertaining to requests for a property manager to make a reasonable modification to accommodate a tenant's disability.
- **Familial Status and Person with Mental Disabilities.** Families with children and persons with mental disabilities are the other protected classes facing alleged discrimination in Burbank.
- **Homeless.** The 2020 point-in-time homeless count identified a total of 291 homeless individuals in Burbank.

Housing Issues: Availability of accessible housing

- **ADU Design Standard.** Public comments from Housing Element community workshops indicated that the need for new ADU design guidelines and standards to accommodate persons with disabilities.

Housing Issues: Neighborhood revitalization

- **Moderate Resource Opportunity Areas.** Although the TCAC/HCD Opportunity Area maps indicate that most of Burbank residents have a high level of access to resources and opportunities, there are two census tracts (CT 310703 and CT 311802) that are identified as moderate resource opportunity areas in the eastern portion of the City along the I-5.
- **Housing Conditions.** Majority of the multi-family housing in Burbank are older than 40 years and require maintenance.

Site Inventory

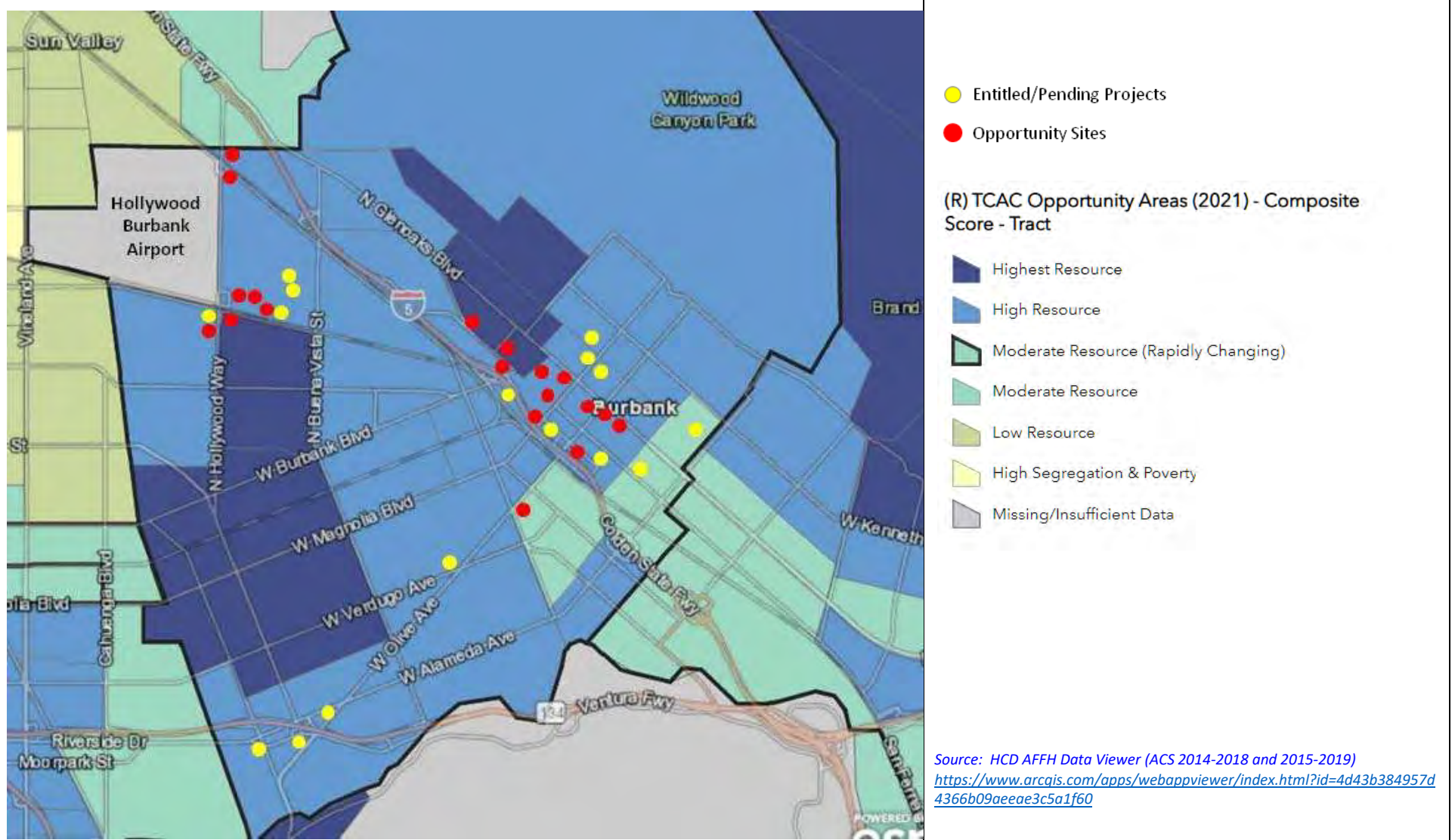
As presented in the Housing Element, Burbank’s future housing growth need is based on the SCAG RHNA (6th cycle) that forecasts the need to accommodate 2,553 very-low (29.1%), 1,418 low (16.2%), 1,409 moderate (16.1%), and 3,392 above moderate income units (38.7%) within the 2021-2029 planning period. The full Sites Inventory of the Housing Element presented in **Appendix D** and summarized in Table B-9 shows the City’s ability to accommodate its fair share of existing and future housing needs for all income groups. Based on approved and pending housing projects, opportunity sites identified in the Burbank Downtown TOD and Golden State specific plans, projected development of accessory dwelling units, and committed assistance to convert market rate units to affordable, the City is able to accommodate the level of housing growth determined in the RHNA.

The higher-density housing sites identified in the Housing Element sites inventory (**Appendix D**) are primarily located in the highest and high resource areas as shown in Exhibit B-21 of the TCAC/HCD Opportunity Areas and sites identified in the Site Inventory. Entitled and pending housing projects are located in high resource areas, with two projects in moderate resource areas. ADUs are distributed throughout the City, with additional opportunities for lot splits and duplexes in high resource single-family neighborhoods through implementation of SB 9. Overall, the sites inventory helps to expand housing options and promotes a pattern of interspersed multi-family residential uses rather than in concentrated locations. The analysis below illustrates that Burbank’s sites inventory: (1) improves areas of opportunity for all Burbank residents; (2) does not exacerbate racially or ethnically concentrated areas of poverty; (3) improves integration; and (4) does not exacerbate displacement risk for Burbank’s residents.

Table B-9
Burbank’s Future Housing Estimates 2021-2029

Sites/Projects	TCAC/HCD Opportunity Areas	General Plan Net Units	Specific Plan Net Units
Downtown TOD	Highest, High Mod. Resources	2,788	3,415
Golden State SP	Highest and High Resources	836	2,651
Media District	High Resources	--	--
Entitlement Projects	High and Moderate Resources	1,845	
Pending Entitlement	High and Moderate Resources	490	
ADUs	Citywide	1,600	
Committed Assistance	High Resources	10	
Total		7,569	10,011
RHNA		8,772	8,772
Difference		(1,203)	1,239

Exhibit B-21
TCAC Opportunity Areas and Site Inventory



Access to Opportunity

As presented in previous Table B-4 and illustrated in Exhibit B-21, 34 of the total 37 sites in the Site Inventory are located in the highest and high resource areas of the City. Resources include access to education, economic, transportation, and environmental opportunities. Of the total number of potential lower-income units, 90 percent are located in the highest/high resources areas and only 10 percent in the moderate resource areas. This pattern is similar for moderate/above moderate income units where 87 percent are located in highest and high resource areas and 13 percent in moderate resources areas. Among all the sites in the highest and high resources areas, the TOD 6-Burbank Town includes the largest number of lower income units with a potential of 1,020 units.

AB 686 requires that all sites identified in the Housing Element to meet the RHNA to be consistent with its duty to affirmatively further fair housing. Additionally, the HCD AFFH guidance memo states that sites must be identified and evaluated relative to socio-economic patterns. This is to ensure that the sites for lower-income housing are located equitably across the city with fair access to opportunities and resources, and that the sites are not concentrated in a single geographic area that could exacerbate segregated living patterns. To address this requirement, Table B-10 presents the distribution of lower income units and moderate/above moderate income units relative to: access to resource opportunities; racial/ethnic concentrated areas; persons with disabilities; familial status; low/moderate income; poverty; and displacement risk areas. Exhibits B-22 to B-27 show the locations of entitled and pending projects and opportunity sites identified in the Site Inventory. It should be noted that ADUs have been approved throughout the City, and therefore, the distribution of projected ADUs are assumed citywide.

Racial/Ethnic Concentrated Areas of Poverty

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) are areas that have both racial/ethnic concentrations and high levels of poverty. As shown previously in Exhibit B-2, there are no census tracts in Burbank that are designated as R/ECAP. Furthermore, Table B-3 presents the 2010 dissimilarity index, which indicates that Burbank was considered relatively integrated with an index of 27.7 for Hispanics as compared to a county index of 63.9 (lower index scores indicate higher levels of integration).

Segregation and Integration

AB 686 requires that jurisdictions identify sites not only to accommodate the levels of housing needs in the RHNA, but also in a manner that is consistent with affirmatively furthering fair housing. This analysis must address whether the site inventory decreases any existing segregated living patterns and promotes integration among the protected classes. The following analysis discusses the levels of segregation and integration in relation to race/ethnicity, persons with disabilities, familial status, seniors, and income groups.

- **Minority Concentration.** The White population accounts for 57 percent of the total population of Burbank, and the Hispanic population, which is the largest minority group, accounts for 24 percent. As shown in Exhibit B-22, most census tracts in the City are predominantly White, though as previously noted, persons of Armenian descent comprise an estimated 15 percent of Burbank's population and fall within the White racial category. It shows the Hispanic population concentrated in the triangular census tract (CT 3105.01) located east of Hollywood Burbank Airport and CT 3118.02 located south of the I-5 and southeast of Olive Avenue. Table B-10 shows that 85 percent of lower income units in the sites inventory are located in census tracts that are predominantly White, with the remaining 15 percent of the lower income units in predominantly

Hispanic tracts. There is a slightly larger proportion (19%) of moderate and above moderate income units in predominantly Hispanic area.

- **Persons with Disabilities.** According to the ACS 2018 data, an estimated 11,216 Burbank residents (10.8%) have some type of disability. As illustrated in Exhibit B-23, no census tracts are identified as having a high concentration (over 30%) of persons with disabilities. Only one census tract (CT 3107.01), located near Downtown Burbank north of the I-5 has a moderate (20-30%) concentration of persons with disabilities. Since most of Burbank is identified as highest and high resource areas, including CT 3107.01, persons with disabilities have access to social and medical services, retail establishments, and public transportation. Table B-10 shows that almost two-thirds (64%) of the lower income units in the Housing Element sites inventory are in census tracts with less than 20 percent of the population with some form of disability and the remaining one-third of the lower income units are in census tracts with greater than 20 percent disabled. The percentage of moderate and above moderate income units are even higher (85%) in census tracts with less than 20 percent of the population disabled.
- **Familial Status.** Familial status for this analysis refers female-headed households with children under the age of 18. Approximately four percent of the households in Burbank are female-headed households with children. As previously mentioned, these households require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. In addition, families with children sometimes face housing discrimination related to property owner fears of excessive noise and property damage. Exhibit B-24 shows the location of proposed housing sites relative to census tracts with a percentage of households with children in single parent female-headed households. It shows that the highest concentration is in CT 3118.02, which is located in the eastern portion of the City, south of the I-5 and includes the TOD 11-Victory/Olive opportunity site. In addition, Table B-10 shows that over one-half (53%) of the lower income units identified in the site inventory are in census tracts with greater than 20 percent of children of single female-head of households.
- **Seniors (65+).** Burbank's older residents, persons 65 years of age or older, have experienced a steady proportional increase in population, and represent approximately 15 percent of the total population of Burbank. Based on Census 2019 ACS data, senior residents are concentrated in Downtown Burbank in CT 3107.01 and CT 3107.02. Approximately one-third of the residents of CT 3107.01 and almost one-fourth of the residents of CT 3107.02 are seniors. Table B-10 shows that 57 percent of the total lower income units in the site inventory are located in these two census tracts (CT 3107.01 and CT3207.02). The remaining 43 percent of lower income units are located in census tracts with less than 20 percent seniors.
- **Low - Moderate Income.** As illustrated in Exhibit B-25, census tracts with a high percentage (50-75%) of low - moderate income households are concentrated along the I-5 corridor. These generally coincide with the transit and jobs-rich areas that are proposed for future investment and new development of residential and commercial uses with the adoption and implementation of the Burbank Downtown TOD Specific Plan and Golden State Specific Plan. Table B-10 shows that almost three-fourths (72%) of the lower income units in the site inventory are in areas with greater than 50 percent low - moderate income households.
- **Poverty.** Exhibit B-26 shows that only one census tract (CT3107.03) located in the eastern portion of Burbank and north of I-5, has a poverty status of 20-30 percent of the population of that census tract whose income is below poverty level. Table B-10 also shows that less than one percent or 13 units of the City's lower income units in the site inventory are located in CT 3107.03 and over 99 percent of the lower income units are in census tracts where less than 10 percent of the

population live below the poverty level. It should be noted that HUD uses greater than 40 percent poverty as one of its criteria for designating an R/ECAP census tract -- a poverty level not witnessed in any census tract within the Burbank.

Table B-10
Fair Housing Assessment of Sites Inventory

Census Tract Areas	Categories	Lower Income Units	Moderate and Above Mod. Income Units
Racial/Ethnic Concentration	Predominantly White	85%	81%
	Predominantly Hispanic	15%	19%
TCAC/HCD Opportunity Areas	Moderate Resources	10%	13%
	Highest/High Resource	90%	87%
Persons with Disabilities	Less than 20% of Pop. Disabled	64%	85%
	Greater than 20% of Pop. Disabled	36%	15%
Familial Status	Less than 20% of Children of Single Female Head of HH	47%	59%
	Greater than 20% of Children of Single Female Head of HH	53%	41%
Seniors (65+)	Less than 20% of Pop. Seniors	43%	69%
	Greater than 20% of Pop. Seniors	57%	31%
Low-Moderate Income	Less than 50% Pop. Low/Mod. Inc.	28%	47%
	Greater than 50% Pop. Low/Mod. Inc.	72%	53%
Poverty	Less than 20% of Pop. in Poverty	>99%	99%
	Greater than 20% of Pop. in Poverty	<1%	1%
Displacement Risk	Susceptible/Ongoing Displacement	54%	33%
	Stable Moderate/Mixed Income	29%	48%
	Becoming Exclusive, and Stable/Advanced Exclusive	17%	19%

Source: HCD AFFH Data Viewer (ACS 2015-2019)

Note: HUD defines lower income as less than 50% of AMI and moderate incomes as 51-80% of AMI.

Exhibit B-22
Predominant Racial/Ethnic Population and Housing Element Sites



● Entitled/Pending Projects

● Opportunity Sites

(R) Predominant Population - White Majority Tracts

Dominance Value

■ Predominant (gap > 50%)

■ Sizeable (gap 10% - 50%)

■ Slim (gap < 10%)

(R) Predominant Population - Hispanic Majority Tracts

Dominance Value

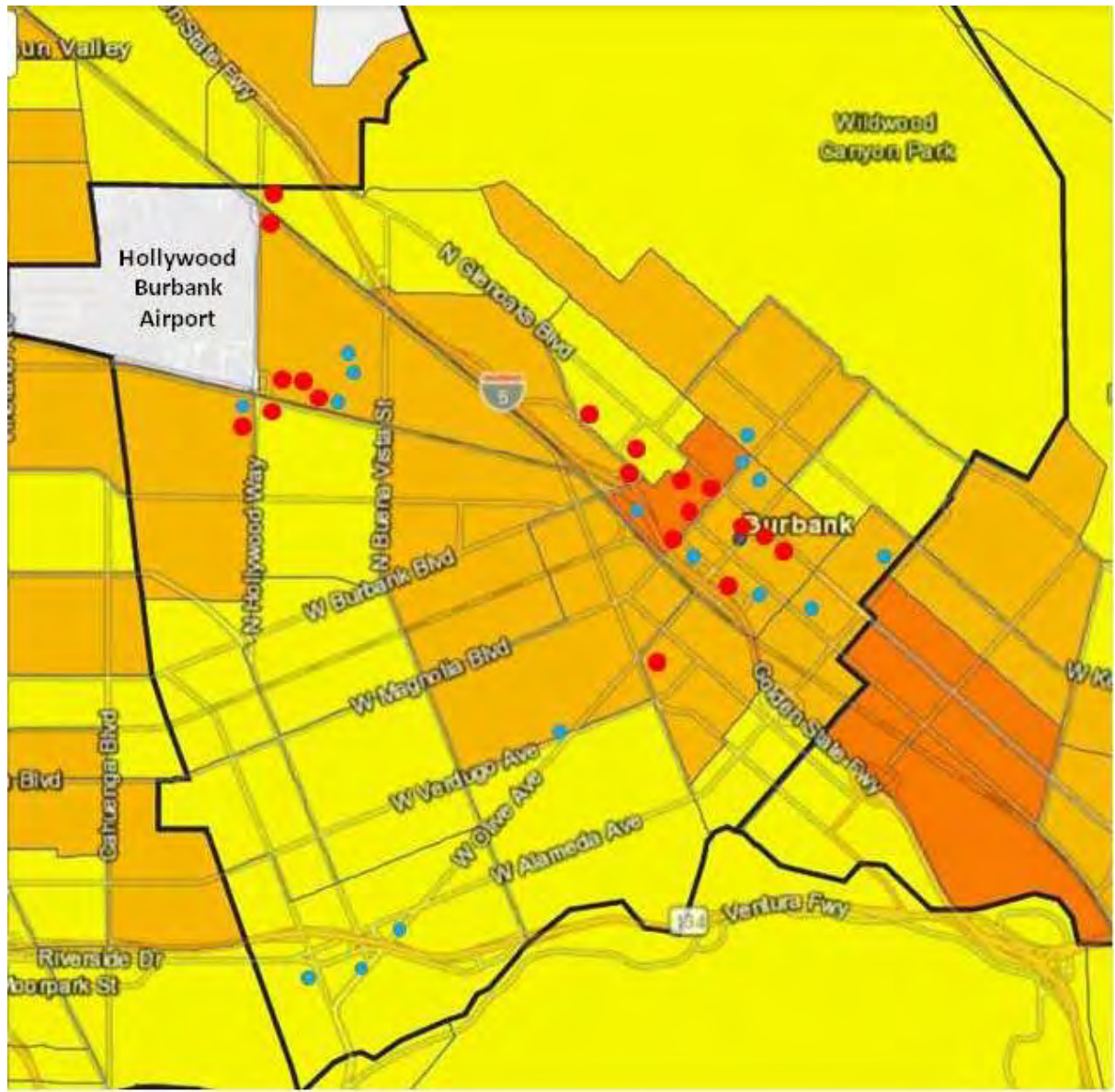
■ Predominant (gap > 50%)

■ Sizeable (gap 10% - 50%)

■ Slim (gap < 10%)

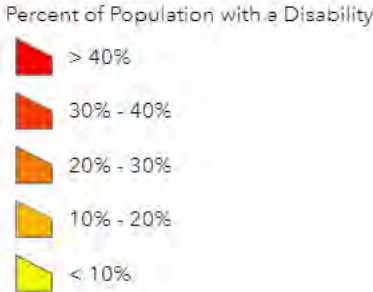
Source: HCD AFFH Data Viewer (ACS 2014-2018 and 2015-2019)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Exhibit B-23
Population with a Disability and Housing Element Sites



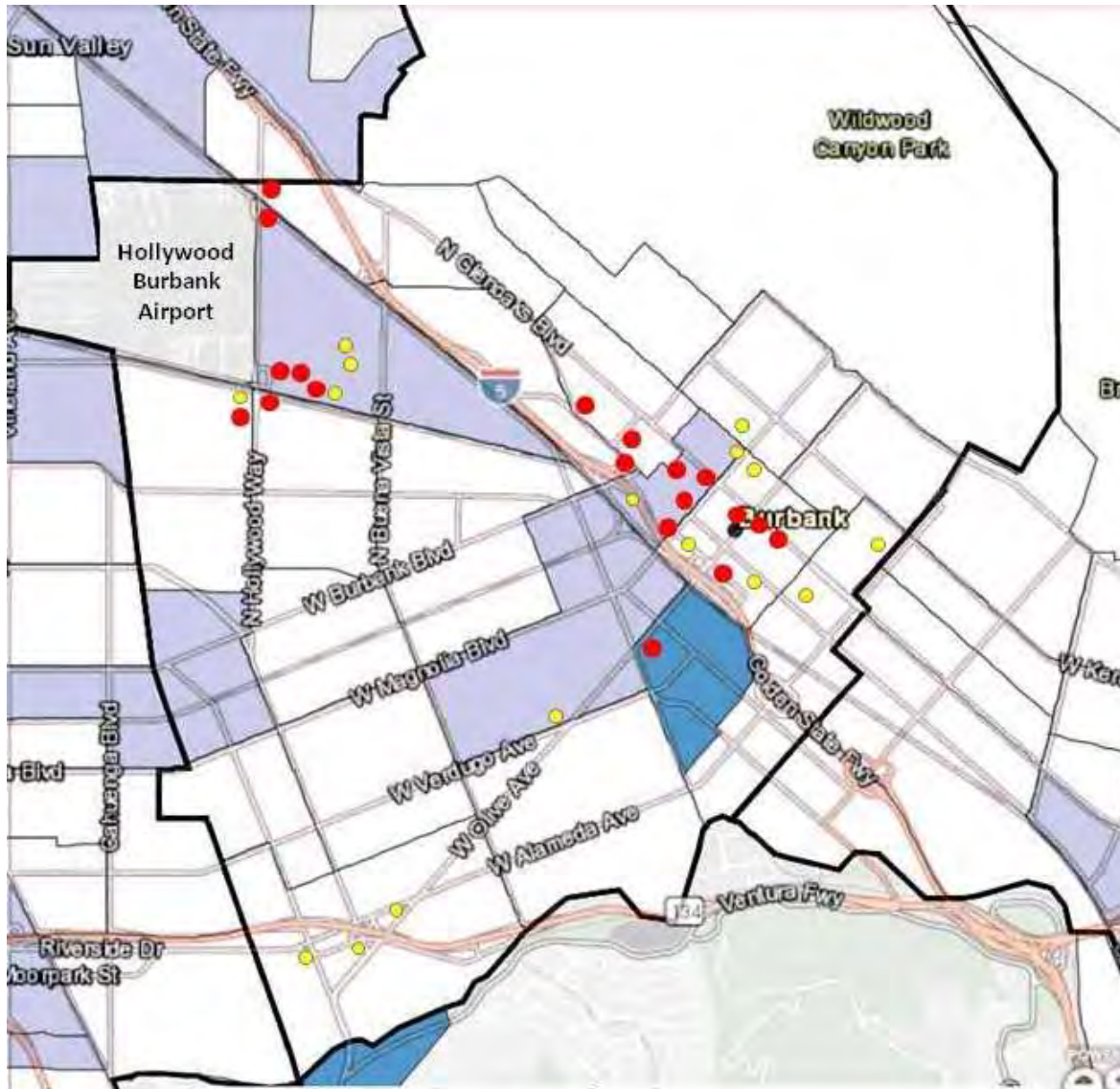
- Entitled/Pending Projects
- Opportunity Sites

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



Source: HCD AFFH Data Viewer (ACS 2015-2019)
<https://www.arqgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeae3c5a1f60>

Exhibit B-24
Children with Female Householder, No Spouse/Partner and Housing Element Sites



- Entitled/Pending Projects
- Opportunity Sites

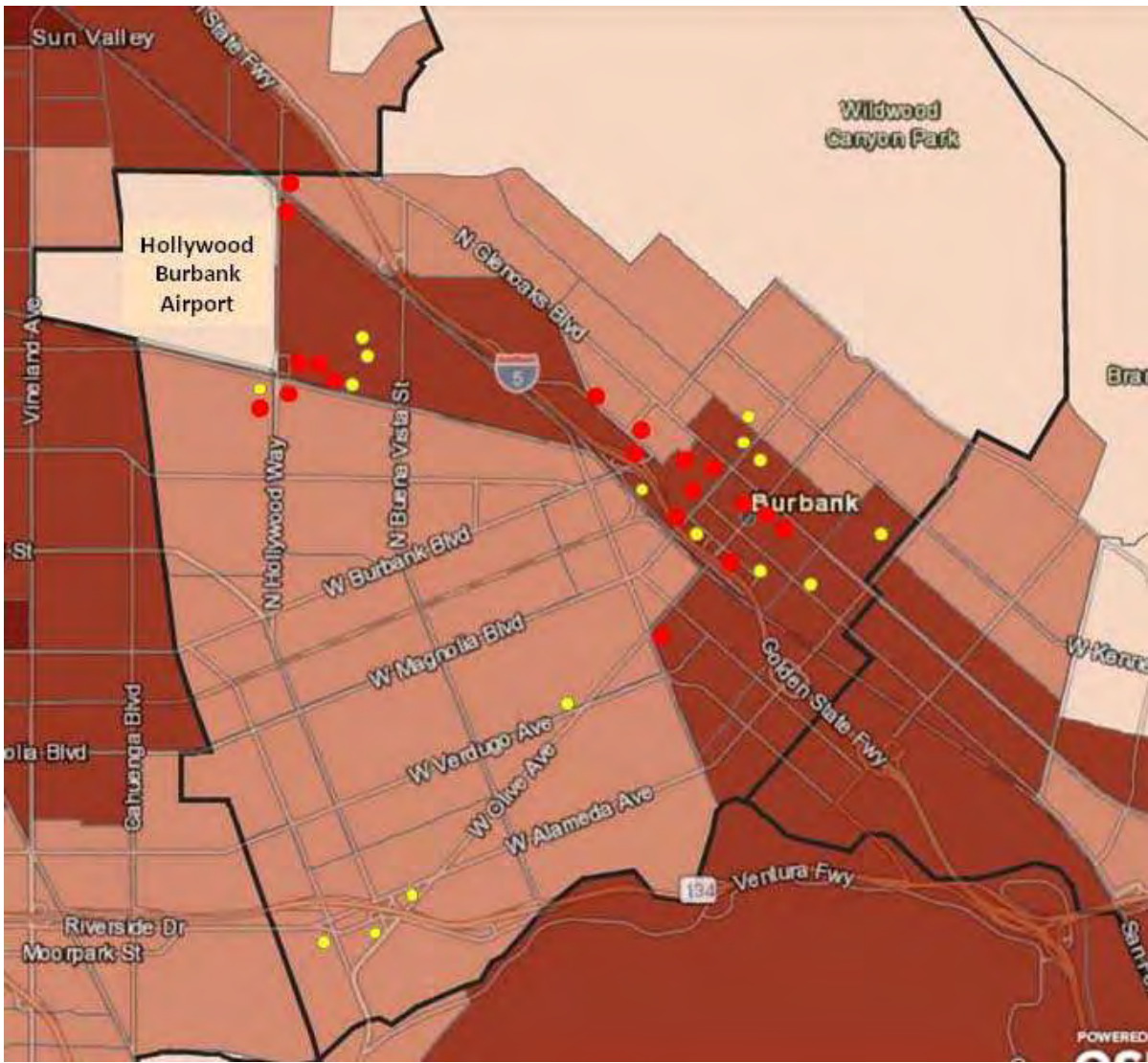
(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

Percent of Children in Female Householder, No Spouse/Partner Present Households



Source: HCD AFFH Data Viewer (ACS 2015-2019)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

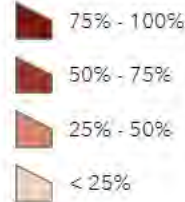
Exhibit B-25
Low-Moderate Income Population and Housing Element Sites



- Entitled/Pending Projects
- Opportunity Sites

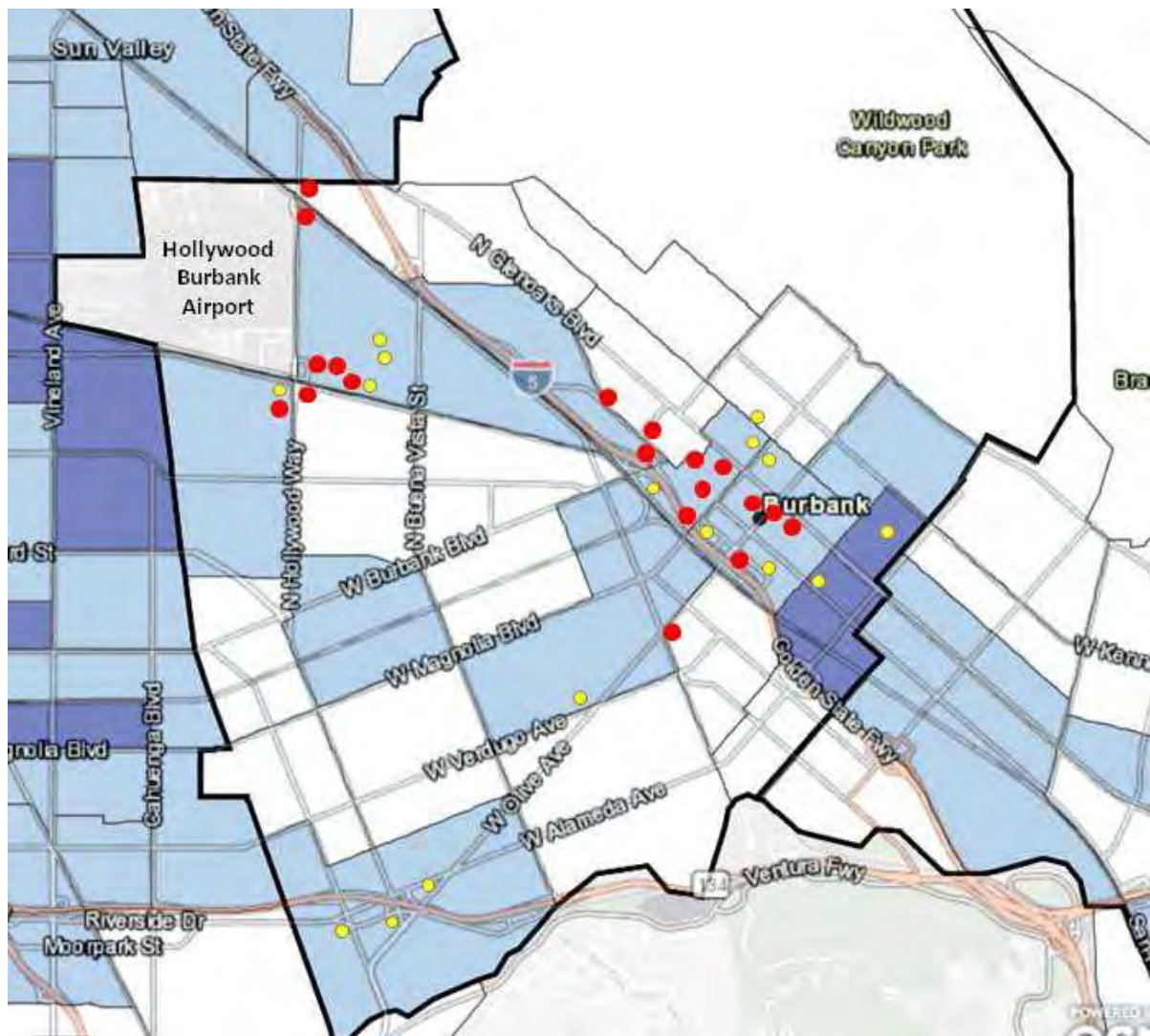
(A) Low to Moderate Income Population (HUD) - Tract

Percent Low-Moderate Income Population



Source: HCD AFFH Data Viewer (ACS 2015-2019)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

**Exhibit B-26
Poverty and Housing Element Sites**

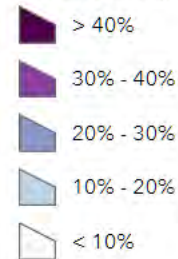


● Entitled/Pending Projects

● Opportunity Sites

(R) Poverty Status (ACS, 2015 - 2019) - Tract

Percent of Population whose income in the past 12 months is below poverty level



Source: HCD AFFH Data Viewer (ACS 2015-2019)
<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>

Displacement Risk

A mapping tool was developed by the UCLA Urban Displacement Project using Census ACS 2018 data to help stakeholders better understand where neighborhoods are changing and are vulnerable to gentrification and displacement in Los Angeles, Orange, and San Diego Counties⁷. As illustrated in the following Exhibit, a vast majority of Burbank census tracts are identified as Stable Moderate/Mixed Income. However, areas most susceptible to displacement include three connecting census tracts (CT 3107.01, CT 3107.02, and CT 3107.03) located southeast of Burbank Boulevard in downtown Burbank to the border with the City of Glendale. These census tracts are identified as Low-Income/Susceptible to Displacement or Ongoing Displacement of Low-Income Households and are mostly lower-income areas or have experienced an absolute loss of low-income households between 2000 and 2018.

The Downtown TOD Specific Plan accommodates 3,415 new units on Housing Opportunity sites, with 85 percent of these units affordable to lower income households. The Specific Plan area includes portions of Census Tracts 3107.01, 3107.02, and 3107.03 (identified as vulnerable to displacement), and also have disproportionate numbers of lower income and minority households, persons with income below the poverty level, the elderly, and persons with disabilities, and therefore, would be affected by the redevelopment of the downtown area. There are seven TOD Housing Opportunity sites located within the three census tracts. In 2019, the total number of units in the three census tracts totaled approximately 7,000 units with a population of 13,500 residents. The projected increase in housing units of the seven TOD opportunity sites in the displacement-risk census tracts is approximately 2,600 units of which approximately 2,300 units or 88 percent will be available to lower income households. Assuming the area's current persons per dwelling unit of 2.0, the population is estimated to increase by 5,200 residents. Development of these sites will not directly cause significant displacement as they are currently developed with predominately non-residential uses – only eight existing units. However, new market rate development in areas already at-risk of displacement may place upward pressure on rents, resulting in the potential displacement of existing lower income residents. Locating lower income sites in these areas can help to protect vulnerable residents from being displaced under changing market pressures.

With a strong housing market for both owner homes and rental units in Burbank and a shortage of housing statewide, the average apartment rent in Burbank have increased by 40 percent since 2013. The information on rents in Burbank is based on surveys conducted in 2013 and 2020. As a result, many lower income households have been priced out of the ownership and rental housing market and must look elsewhere for housing. Also, the majority of lower income renters face overpayment. The burden of higher housing cost is supported by data from the Census ACS 2015-2019 estimates that show CT 3107.02 and CT 3107.03 continue to have the highest proportion of cost-burdened renters in the City (more than 30% of household income going towards housing). At the other end of the scale are three census tracts: CT 3111 located south of the Hollywood Burbank Airport is designated Becoming Exclusive, which is part of the Golden State Specific Plan areas that also included census tracts designated Stable Moderate/Mixed Income; and CT 3101 and CT 3103 in the northern part of the City are designated Stable/Advance Exclusive. The location of the census tracts and the criteria used to define the designations are presented in Exhibit B-27.

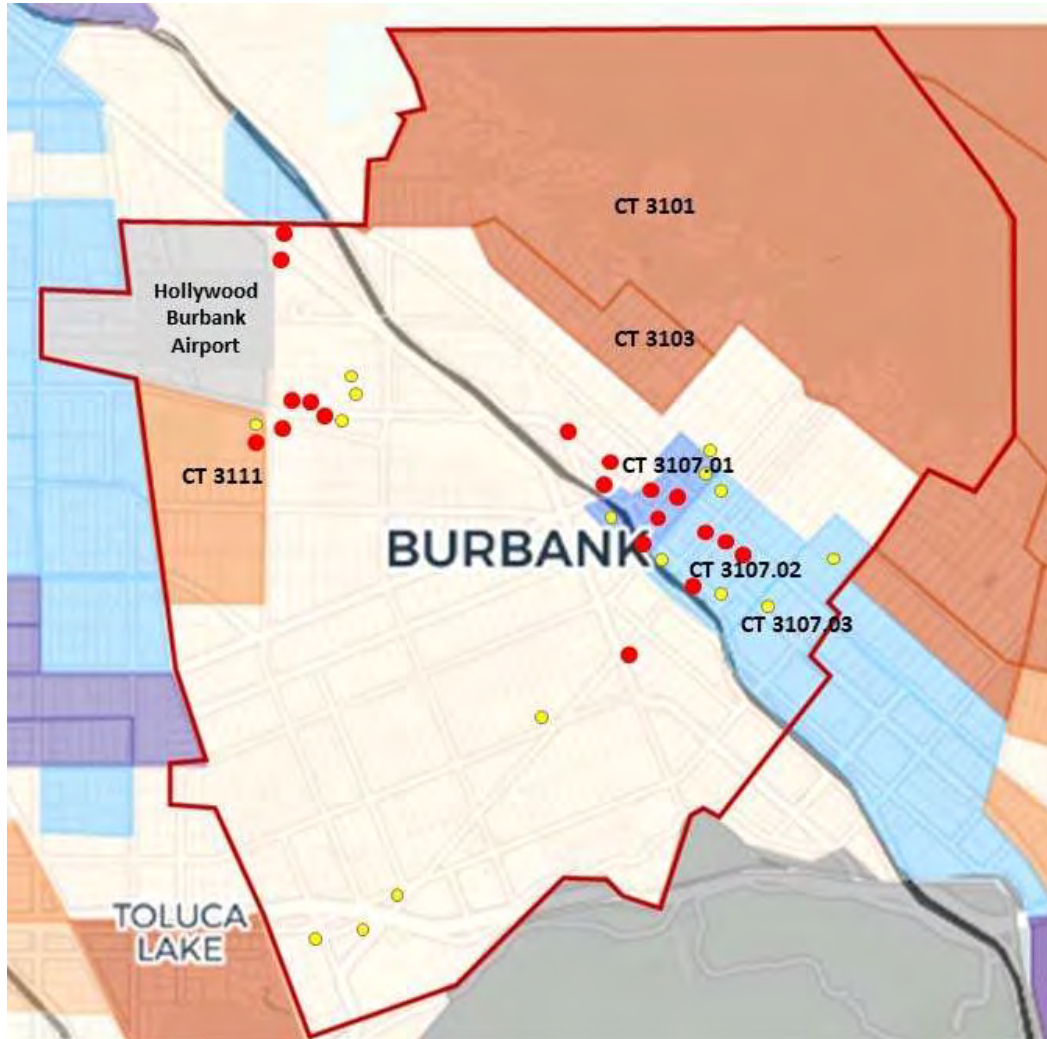
Program objectives being considered in the Specific Plan and include programs to provide greater access to these units for current lower income households in these at-risk areas, and therefore, reduce the potential for displacement of lower-income residents. Moreover, it is anticipated that the opportunity sites identified within the boundaries of the Specific Plan would request density bonus approval and would

⁷ UCLA Urban Displacement Project, <https://www.urbandisplacement.org/los-angeles/los-angeles-gentrification-and-displacement>

therefore be subject to State Density Bonus law that limits the displacement of units as well as calling for replacement units.

In addition, Burbank carries out several anti-displacement programs including limits on rent increases and prohibiting evictions without just cause for tenants that have resided in their units for more than 12 months; providing relocation fees when state or federal funds are utilized; and offering existing households an opportunity to return to the new development. The Burbank Housing Authority continues to administer and expand the use of Federal vouchers offering tenant assistance for lower income residents, allowing tenants to remain in their units and providing preference on the wait list for residents spending more than half their incomes on rent (at-risk of displacement). Furthermore, beginning in July 2022, the Housing Authority will be partnering with a local service provider to administer the Lifting People Up program for very low-income residents at-risk of homelessness and will assist such households in increasing income, securing employment and maintaining their housing. Finally, the City implements the requirements of Government Code Sec. 65583.2(g)(3), which requires that for any proposed development on a site that has had residential uses within the past five years that are or were subject to lower income affordability restrictions, or are or were occupied by lower income households, the City shall require the replacement of all affordable units at the same or lower income level as a condition of development on the site. Thus, the level of housing growth affordable to lower income households and the displacement programs will not exacerbate displacement in at-risk areas.

Exhibit B-27
Displacement Risk and Site Inventory



- Entitled/Pending Projects
- Opportunity Sites

MODIFIED TYPES	CRITERIA
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	<ul style="list-style-type: none"> • Low or mixed low-income tract in 2018
EARLY/ONGOING GENTRIFICATION	<ul style="list-style-type: none"> • Low or mixed low-income tract in 2018 • Absolute loss of low-income households, 2000-2018
ADVANCED GENTRIFICATION	<ul style="list-style-type: none"> • Low-income or mixed low-income tract in 2018 • Housing affordable to low or mixed low-income households in 2018 • Didn't gentrify 1990-2000 OR 2000-2018 • Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018 • Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap
STABLE MODERATE/MIXED INCOME	<ul style="list-style-type: none"> • Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs • Gentrified in 1990-2000 or 2000-2018
STABLE/ADVANCED EXCLUSIVE	<ul style="list-style-type: none"> • Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Rapid increase in housing costs • Absolute loss of low-income households, 2000-2018 • Declining low-income in-migration rate, 2012-2018 • Median income higher in 2018 than in 2000
STABLE/ADVANCED EXCLUSIVE	<ul style="list-style-type: none"> • High-income tract in 2000 and 2018 • Affordable to high or mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs

Source: Urban Displacement Project, UC Berkeley, <https://www.urbandisplacement.org/>

Existing Deed-Restricted Affordable Housing

The description of deed-restricted affordable rental housing is presented in Table 1-25 of the Housing Element. The opportunity sites are in close proximity to existing deed-restricted affordable rental housing in the City, while others are in areas of the City with fewer existing deed-restricted affordable housing. The affordable rental housing sites are in areas with access to resources and opportunities such as education, services, jobs, and transit, and they provide additional lower income housing to those susceptible to displacement.

Local Information and Knowledge

In the preparation of the City's 2021-2029 Housing Element and the Burbank Analysis of Impediments to Fair Housing Choice, the City consulted with various stakeholders regarding housing needs and fair housing issues. During the initial stages of developing the Housing Element, the City conducted two virtual stakeholder consultation workshops. First workshop was for housing developers. The second workshop was for housing service providers and housing advocates that serve the lower income community and special needs groups. In addition, as part of the Burbank AI, the City implemented a community outreach program that included consultation with housing service providers. The following local housing needs and fair housing issues were highlighted during the Housing Element and AI outreach efforts:

- Available housing for Burbank's growing low and moderate income workforce is not being produced in the market.
- Cost burden has significant impacts on the special needs population.
- Continuing need for public awareness of available housing services and knowledge of fair housing laws for both tenants and landlords/property owners.
- Certain special needs groups experienced a high incidence of discrimination complaints. Housing for persons with physical disabilities continues to be the top discrimination complaint in Burbank.
- Shortage of housing designed to accommodate persons with disabilities. Building Code requirements (Title 24) for accessibility in new construction are insufficient to meet the need for accessible housing in the community, particularly with the City's aging population.
- Neighborhoods in Burbank require revitalization to improve the existing housing and economic conditions of the area; especially with the limited funds available for redevelopment.
- Details of the complete Housing Element public participation program are included as **Appendix F** of the Housing Element.

Fair Housing Actions

Burbank is committed to furthering fair housing through the implementation of Housing Element policies and programs, Burbank AI actions, proposed City actions in this AFFH as they relate to factors contributing to fair housing issues. Table B-11 that follows presents: the five primary fair housing issues in Burbank; evidence and factors that contribute to these issues; priority of addressing the issues, and identifying meaningful actions by the City.

Table B-11
Housing Issues, Contributing Factors and City Actions

FAIR HOUSING ISSUES <i>Condition that restricts fair housing choice or access to opportunity</i>	CONTRIBUTING FACTORS/ EVIDENCE AND PATTERNS <i>Factors that create, contribute to, perpetuate, or increase the severity of fair housing issues</i>	PRIORITY	CITY ACTIONS <i>City's commits to addressing the fair housing issue during the Housing Element planning period of 2021-2029</i>	TARGETS <i>Measure of performance</i>	CORRESPONDING HE PROGRAMS <i>Implements HE Program</i>
Need for Affordable Housing of Various Types and Sizes <i>(Housing Mobility, New Housing Choices, Displacement Protection)</i>	1. Lack of affordable housing in affluent areas <ul style="list-style-type: none"> ▪ Affordable housing in affluent areas. No new lower income units are proposed in affluent census block groups (median income greater than \$125,000) and approximately one-quarter of new lower income housing in area with median incomes between \$87,100 - \$125,000. Only 16 percent of new lower income units proposed in predominantly White areas. 	High	<ul style="list-style-type: none"> ▪ In 2022, incorporate incentives in the Downtown TOD Specific Plan, including streamlined land use entitlement procedures, for accessible units beyond the state required minimums and universal design in new developments which ensures housing can be used by residents throughout their lifespan. ▪ Initiate a policy to provide developers with State HCD's New Home Universal Design Checklist and encourage them to offer Universal Design features to interested buyers. 	Adopt the Downtown TOD Specific Plan with design guidelines and incentives for accessible units and housing designed according to universal design principles. Require all new units in multi-story buildings to be adaptable (readily modifiable for accessibility), and seek to achieve at least 6% of units in buildings with public funding to be fully accessible (estimated 23 accessible units in the TOD Specific Plan).	HE 5-Housing Opportunity Sites
			<ul style="list-style-type: none"> ▪ Starting in January 2022, expand the housing supply in High Resource single-family zones by allowing for lot splits and duplexes under the parameters of SB 9 	Through implementation of the City's SB 9 ordinance, seek to integrate at least five units annually in high resource single-family districts.	New State Housing Law signed in 2021

		<ul style="list-style-type: none"> In 2023, provide a streamlined approval process for affordable housing projects that qualify for tax credits and/or other grant funds. 	<p>Adopt the Downtown TOD and Golden State Specific Plans with streamlined approval processes.</p>	<p>HE 5-Housing Opportunity Sites</p> <p>HE 8-Public/ Private Partnership</p> <p>HE 9- Affordable Housing Development Assistance</p> <p>HE 17-Objective Development Standards</p>
		<ul style="list-style-type: none"> In 2023, develop pre-approved/prototype accessory dwelling unit (ADU) plans to streamline the approval process and lower the cost for developers. 	<p>Develop at least three (3) pre-approved/ prototype ADUs, including one smaller sized, lower cost option. Seek to issue permits for 200 ADUs annually, including 80% in high and highest resource neighborhoods (see Exhibit B-21) to foster a more inclusive community.</p>	<p>HE 6a-Promote ADUs</p>
		<ul style="list-style-type: none"> In 2023, begin promoting first-time homebuyer opportunities in high resource neighborhoods through both regulatory and financial incentives. Conduct affirmative marketing to promote equal access to homeownership opportunities. 	<p>Adopt regulatory tools, including a small lot subdivision ordinance, zoning for missing middle housing, and an updated Inclusionary Ordinance to increase affordable homeownership options by 10%.</p>	<p>HE 12 – Affordable Homeownership Program</p>

<p>2. Lack of affordable rental housing for large households</p> <ul style="list-style-type: none"> ▪ Large Households. Disparity in the supply and demand for large rental units which contributes to nearly one-fifth of the City’s renter households residing in overcrowded conditions. 	<p>High</p>	<ul style="list-style-type: none"> ▪ Continue to work with the City’s non-profit housing partner, the Burbank Housing Corporation (BHC) for the development of two plus- bedroom units. 	<p>Develop 10 two plus-bedroom units through non-profit housing partners and BHC. To date BHC has acquired and rehabilitated 178 two plus bedroom units.</p>	<p>HE 21-Zone Text Amendments for Special Needs Housing</p>
		<ul style="list-style-type: none"> ▪ Continue to provide regulatory incentives such as a density bonus and/or concessions to private developers to increase the supply of affordable housing throughout the community for the development of two plus-bedroom units. 	<p>Increase the use of density bonuses by 10%.</p>	
		<ul style="list-style-type: none"> ▪ Continue to utilize landlord financial incentives such as lease signing bonuses, vacancy holding fees, and security deposit assistance to assist large households with a housing voucher to access rental units. 	<p>Increase the use of landlord financial incentives by 10%.</p>	
<p>3. Displacement of residents due to economic pressure</p> <ul style="list-style-type: none"> ▪ Housing Cost Burden. 56 percent of total renters pay over 30 percent of their total household income on housing. ▪ Senior Population. Seniors experience high housing cost burdens, with almost one-third of senior households overpaying for housing. 	<p>High</p>	<ul style="list-style-type: none"> ▪ Annually partner with Burbank Housing Authority (BHA) to administer the Rental Assistance Voucher program, including targeted vouchers for VASH (Veterans Affairs Supportive Housing), Emergency Housing Vouchers and Permanent Supportive Housing. ▪ Utilize the Landlord Incentive Program to assist qualifying Permanent Supportive Housing (PSH), Veterans Affairs Supportive Housing (VASH), and Emergency Housing Voucher (EHV) holders with moving expenses (on a case-by-case basis) and security deposits. 	<p>Continue to administer an average of 1,116 vouchers per year. To ensure vouchers are utilized throughout the City, provide voucher holders with a map delineating higher resourced areas to encourage leasing in these areas. Furthermore, annual notice will be provided</p>	<p>HE 4 -Rental Assistance Vouchers</p>

	<ul style="list-style-type: none"> ▪ Lower-Income Households. Majority of renter households earning less than \$50,000 in Burbank face overpayment. ▪ Housing Cost. Median rental rates in Burbank exceed affordability levels for lower income households. ▪ Displacement Risk. Three census tracts where the increase in rents may cause a risk of displacement. 		<ul style="list-style-type: none"> ▪ In 2022, update and implement the Inclusionary Housing Ordinance and Density Bonus Ordinance to effectively integrate affordable units in market rate projects. 	<p>to landlords in higher resource areas about source of income protections under the FEHA⁸ and to educate them that housing incentive funds may be available if a unit is leased to a voucher holder⁹ (2023). Provide preference to residents spending more than half their incomes on rent (at-risk of displacement).</p> <p>Adopt an updated Inclusionary Housing Ordinance and Density Bonus Ordinance in 2022 . Seek to achieve at least 15% very low, low and moderate income units in developments with 5 or more units, including 90% of these affordable units in high and highest resource neighborhoods (see Exhibit B-21). Increase the use of density bonuses by 10%.</p>	<p>HE 9-Affordable Housing Development Assistance</p> <p>HE 10-Inclusionary Housing Ordinance</p> <p>HE 11-Density Bonus Ordinance</p>
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⁸ As of January 2020, the California Fair Employment and Housing Act (FEHA) protects tenants from housing discrimination based on source of income, including Section 8 Housing Choice Vouchers.

⁹ Landlord incentives are targeted to disabled households with a permanent supportive housing voucher.

		<ul style="list-style-type: none"> In 2022/2023, develop and adopt the Downtown TOD, Golden State, and Media District Specific Plans to provide the necessary zoning, objective development standards, and processing procedures to facilitate the production of higher density and affordable housing opportunities near employment transit centers. 	Adopt the Downtown TOD, Golden State, and Media District Specific Plans.	HE 5-Housing Opportunity Sites
		<ul style="list-style-type: none"> Annually partner with BHA to selectively acquire and rehabilitate property to expand unit sizes, improve unit conditions, and add necessary community facilities in focus neighborhoods using CDBG and HOME funds. Continue to provide gap financing for affordable housing projects, with special consideration for projects that set aside units for extremely low-income households and persons with disabilities. 	Acquire and rehabilitate three units annually and 24 units over the 2021-2029 planning period. BHC has acquired and rehabbed over 300 units in Burbank.	HE 1-Neighborhood Revitalization/Community Building
		<ul style="list-style-type: none"> Through 2023, provide rapid-rehousing and transitional housing to assist extremely low income individuals or households using Permanent Local Housing Allocation (PLHA) funds. 	<p>Assist 44 households with rapid rehousing assistance in the first program year.</p> <p>Assist 40 individuals with navigation service in the first program year.</p> <p>Over the 2021-2029 planning period, provide 130 rapid-rehousing units and 480 individuals housing navigation service.</p>	HE 27-Housing for Extremely Low Income Households

			<ul style="list-style-type: none"> Pursue state funding and other funding as available, to provide housing for individuals and/or families who are experiencing homelessness or who are at risk of homelessness. Utilize HOME-ARP funding by September 30, 2030 to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing possible housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. 	<p>Develop 26 modular homes for the homeless. Currently there are no modular homes for the homeless in the city.</p> <p>Annually apply for Measure H funding and prioritize 100% of the funds, as available, for ongoing interim housing operations</p>	HE 25 Homeless Housing and Services
			<ul style="list-style-type: none"> Starting in 2022 seek opportunities to master lease residential rental units/recuperative care for at-risk and homeless adults and special needs populations in an effort to prevent and divert people from becoming homeless. 	As a new program, partner up with program operators/developers to negotiate master lease agreements.	HE 25 Homeless Housing and Services
			<ul style="list-style-type: none"> In 2022 develop and adopt the Downtown TOD, Specific Plan to provide the necessary zoning, objective development standards, and processing procedures to facilitate the production of higher density and affordable housing opportunities in the three displacement risk areas of Burbank. 	Adopt the Downtown TOD Specific Plan.	HE 5-Housing Opportunity Sites
			<ul style="list-style-type: none"> Continue anti-displacement programs including: limits on rent increases and prohibiting evictions without just cause for tenants that have resided in their units for more than 12 months; providing rent mediation and other conflict resolution services through the Landlord-Tenant Commission; providing relocation fees when state or federal funds are utilized; offering existing households an opportunity to return to the new development; and prioritizing rental assistance to households spending >50% of 	Implement programs to protect existing residents from displacement and expand awareness in the community of available protections by increasing outreach and provision of informational materials through the Housing	<p>HE 3-Preserve and Protect Existing Tenants and Housing</p> <p>HE 24-Landlord-Tenant Services and Mediation</p>

			income on housing costs.	Authority and Landlord Tenant Commission. ¹⁰ Increase the supply of deed-restricted affordable housing to allow low and moderate income residents options to remain in the community, including requiring 15% affordable units in projects with 5+ units; acquiring and rehabilitating 24 units for long-term affordable housing; purchasing of affordability covenants on 10 market rate units; and establishing a goal to achieve at least 400 affordable units through SB 35 projects.	
			<ul style="list-style-type: none"> In 2022, the Housing Authority will partner with a local service provider to administer the Lifting People Up (LPU) program for very low-income residents at-risk of homelessness and will assist such households in increasing income, securing employment and maintaining their housing. 	Help stabilize at-risk households through the LPU program, and utilize available City locations, including BHC activity centers located in low and moderate income neighborhoods, for programming.	HE 25-Homeless Housing Services

¹⁰ This will be achieved by: 1) continuing two social media posts a month and adding 2-3 posts in the year to highlight new information and laws; 2) continuing to post new information, laws and updates on the City's website (homepage); and 3) continuing to place Ads in printed media available through the Burbank Water and Power (BWP) and Parks and Recreation Department. The BWP "CURRENTS" Newsletter is also available digitally, and the information is streamed daily both on monitors in the BWP lobby and on Burbank Channel 6.

<p>Need Public Education of Fair Housing Services and Fair Housing Rights</p> <p><i>(Housing Mobility, Displacement Protection)</i></p>	<p>1. Lack of fair housing information due to language barriers</p> <ul style="list-style-type: none"> ▪ Racial/Ethnic Diversity. As Burbank becomes more ethnically and racially diverse, changes occur in terms of different income levels, family types, and languages spoken. English proficiency may affect housing needs and opportunities, and the residents’ understanding of their fair housing rights. 	<p>Moderate</p>	<ul style="list-style-type: none"> ▪ Annually partner with Housing Rights Center (HRC) to promote fair housing practices, and provide multi-language (Armenian, English, and Spanish) educational information on fair housing to the public through distribution of fair housing brochures, training sessions, workshops, and press releases/public service announcements. ▪ Annually distribute multi-lingual fair housing mailings to buildings with concentrations of immigrant tenants based on statistical and demographic information collected by the City, HRC, and BHC. Continue to provide tenants and landlords with resources on fair housing, procedures on filing a complaint, information on the Burbank Landlord-Tenant Commission, and provide copies of HCD’s Landlord/Tenant Rights booklet in multi-languages. ▪ Annually partner with BHA in distributing multi-lingual information on housing opportunities throughout the City, providing landlord apartment listings as available, as well as informational brochures to encourage landlords to participate in the housing choice voucher program. ▪ Annually partner with BHA in monitoring of the racial and ethnic make-up of Section 8 voucher holders and waiting list by the BHA, and provide applications in multi-languages. 	<p>Conduct at least two fair housing informational workshop per year and increase education and outreach via social and print media including printed materials to Burbank Water and Power, the Libraries, Senior Centers and Activity Centers. Through these steps, the City will increase the distribution fair housing material by at least 25% and increase the number of Burbank residents counseled annually through the HRC from an average of 85 to 90.</p>	<p>HE 23-Fair Housing/AFFH</p> <p>HE 24-Landlord-Tenant Services and Mediation</p>
<p>Need Fair Housing for the Special Needs Population</p>	<p>1. Significant special needs population needing fair housing services</p> <ul style="list-style-type: none"> ▪ Persons with Disabilities. Approximately 11 percent of 	<p>High</p>	<ul style="list-style-type: none"> ▪ Annually coordinate with BHA, Landlord-Tenant Commission, and HRC to provide landlord-tenant conflict mediation involving property maintenance, repairs, and lease disagreements, unjust rent increases, and evictions. 	<p>Annual monitoring of the number and outcome of illegal housing discrimination cases and landlord-</p>	<p>HE 23-Fair Housing/AFFH</p> <p>HE 24-Landlord-Tenant Services and</p>

<p>(Housing Mobility, New Housing Choices, Displacement Protection)</p>	<p>Burbank’s population has some type of disability, encompassing physical, mental and developmental disabilities.</p> <ul style="list-style-type: none"> ▪ Fair Housing for Families with Children and Persons with Disabilities. Special need groups experience a high incidence of discrimination complaints. Housing available for families with children and person with physical and mental disabilities continues to be the top discrimination complaint in Burbank. ▪ Homeless. The 2020 point-in-time homeless count identified a total of 291 homeless individuals in Burbank. 		<ul style="list-style-type: none"> ▪ Continue to provide investigations and response to allegations of illegal housing discrimination through HRC. For cases that cannot be resolved, defer to the Department of Fair Housing and Employment, HUD, small claims court, or to a private attorney, as warranted. 	tenant conflict mediations.	Mediation
			<ul style="list-style-type: none"> ▪ In all affordable housing developments that utilize federal, state or local funds, owners/developers will be required to meet the accessibility requirements of the Fair Housing Act and Section 504 of Rehabilitation Act of 1973 	Annual compliance monitoring of Fair Housing Act and Section 504 of Rehabilitation Act.	HE 23-Fair Housing/ AFFH HE 26-Housing for Persons with Disabilities
			<ul style="list-style-type: none"> ▪ Continue to require affirmative fair housing, non-discrimination and equal access in all federally assisted projects. 	Annual compliance monitoring of Fair Housing Act. Update the AI in 2025	HE 23-Fair Housing/ AFFH
			<ul style="list-style-type: none"> ▪ Through 2023 provide rapid-rehousing and transitional housing to assist extremely low income households through the Permanent Local Housing Allocation (PLHA) funds as stated in the PLHA 5-Year Plan. 	Assist 44 households with rapid rehousing assistance in the first program year. Over the 2021-2029 planning period, provide 130 rapid-rehousing units and 120 unhoused households will receive move-in assistance	HE 27-Housing for Extremely Low Income Households
			<ul style="list-style-type: none"> ▪ Pursue state funding and other funds as available, to provide housing for individuals and families who are experiencing homelessness or who are at risk of homelessness. 	Develop 26 modular homes for the homeless. Currently there are no	HE 25 Homeless Housing and Services

			<ul style="list-style-type: none"> Annually pursue Measure H funding for interim housing operations. 	modular homes for the homeless in the city.	
			<ul style="list-style-type: none"> Annually, implement the Homelessness Plan by funding utilization of Section 8 and Emergency Housing Vouchers (EHV) for families at-risk of homelessness. 	Attend regional homeless coordination meetings each month.	HE 25 Homeless Housing and Services
			<ul style="list-style-type: none"> Continue to collaborate on regional efforts to develop supportive housing and affordable housing projects in Burbank, which includes collaboration with the San Fernando Valley Council of Governments, Los Angeles County Homeless Initiative, and Los Angeles Homeless Services Authority 		
Need Accessible Housing <i>(Housing Mobility, New and Accessible Housing Choices)</i>	1. Lack of assistance to modify housing to accommodate the elderly and persons with disabilities <ul style="list-style-type: none"> ADU Design Standard. Public comments indicate the need for new ADU design guideline and standards to accommodate persons with disabilities. Persons with Disabilities. One census tract located in the 	Moderate	<ul style="list-style-type: none"> By 2023, incentivize ADU developers to incorporate accessibility features by establishing and promoting a program to reduce building permit and planning fees. In 2025 conduct a mid-cycle review to evaluate if ADU production levels are achieved. 	Establish accessible design guidelines for ADUs. Reduce building permit and planning fees by up to 50% for qualifying ADUs. Seek to issue permits for 200 ADUs annually, including 80% in high and highest resource neighborhoods (see Exhibit B-21) to foster a more inclusive community.	HE 6a-Promote ADUs HE6b-Track and Monitor ADUs

northwestern portion of Downtown Burbank shows moderate concentration (20-30%) of persons with disabilities and over one-half of this census tract's disabled population is over the age of 65 years.	<ul style="list-style-type: none"> Continue to expedite the permit processing by providing technical assistance and pre-application consultation for housing that sets aside units to persons with physical and developmental disabilities. The City will continue to coordinate housing near transit centers and door-to-door transit services for persons with disabilities. 	Adopt the Downtown TOD and Golden State Specific Plans with accessibility design guidelines, incentives, and streamlined approval processes.	HE 5-Housing Opportunity Sites HE 26-Housing for Persons with Disabilities
	<ul style="list-style-type: none"> Continue to require owners/developers to meet the accessibility requirements the Fair Housing Act and Section 504 of Rehabilitation Act of 1973 in all affordable housing developments that utilize federal, state or local funds. Also, continue to pursue competitive federal grants offered by the Office of Lead Hazard Control and Healthy Homes through the Healthy Homes Initiative to obtain funding for modifying homes to accommodate elderly and persons with disabilities. 	<p>Annual compliance monitoring of Fair Housing Act and Section 504 of Rehabilitation Act.</p> <p>Annually apply for grants offered by the Office of Lead Hazard Control and Healthy Homes and prioritize 100% of the funds, as available for modifying homes for the elderly and persons with disabilities. If funds are received, program funding will be marketed to landlords in low- and moderate-income neighborhoods to help improve conditions in these vulnerable areas.</p>	HE 23-Fair Housing/AFFH HE 26-Housing for Persons with Disabilities
	<ul style="list-style-type: none"> Continue to require affirmative fair housing, non-discrimination and equal access in all federally assisted projects. 	Annual compliance monitoring of Fair Housing Act and Section	HE 23-Fair Housing/AFFH HE 26-Housing for

				504 of Rehabilitation Act.	Persons with Disabilities
			<ul style="list-style-type: none"> As funding permits, continue to provide gap financing for affordable housing projects, with special consideration for projects that set aside units for extremely low-income households and persons with disabilities 	Develop 26 modular homes for the homeless. Currently there are no modular homes for the homeless in the city.	HE 27-Housing for Extremely Low Income Households
Need Neighborhood Revitalization and Resources <i>(Housing Mobility, Place-based Strategies for Community Preservation and Revitalization)</i>	1. Moderate levels of public investments in specific neighborhoods <ul style="list-style-type: none"> Moderate Resource Opportunity Areas. Two census tracts (CT 3107.03 and CT 3118.02) are identified as moderate resource opportunity areas in the City. 	Moderate	<ul style="list-style-type: none"> Continue to provide federal assistance funds (CDBG and HOME) for economic growth, infrastructure, and community services to areas of moderate resources. 	Provide 65% of CDBG funds for community facilities and infrastructure and 100% percent of HOME funds for creating new affordable units via new construction or acquisition/rehab in moderate resources opportunity areas.	HE 1-Neighborhood Revitalization/ Community Building HE 1a-committed Assistance
			<ul style="list-style-type: none"> Continue to work with the City’s non-profit housing partner the BHC to develop affordable housing units in identified census tracts and continue incorporating community serving uses such as childcare, after school care and family programs. 		
	2. Substandard housing conditions <ul style="list-style-type: none"> Deferred Maintenance. Majority of the multi-family housing in Burbank are older than 40 years and require maintenance. 	Moderate	<ul style="list-style-type: none"> Continue to partner with the BHC to develop or acquire and rehabilitate housing units as part of the Neighborhood Revitalization program. 	Construct or acquire and rehabilitate an average of three (3) units per year, a total of 24 units over the 2021-2029 planning period. Convert ten (10) market rate units to permanent affordable units by October 2024.	HE 1-Neighborhood Revitalization/ Community Building HE 1a-Committed Assistance
			<ul style="list-style-type: none"> By October 2024, provide financial assistance of \$5.0 million toward the conversion of market rate units to permanent affordable housing units. (See HE program 1a). Report to HCD on the status of purchasing affordability covenants no later than July 1, 2025 		

			<ul style="list-style-type: none">Continue to support acquisition and rehabilitation activities with an emphasis on community revitalization, integration, and permanent affordable housing.	BHC has acquired and rehabilitated over 300 units in the city.	
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Appendix C

Evaluation of 2014-2021 Housing Element Programs

Appendix C: Evaluation of Accomplishments Under Adopted Housing Element

Under State Housing Element law, communities are required to assess the achievements under their adopted housing programs as part of the update to their housing elements. These results should be quantified where possible (e.g. the actual 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 Burbank 2014-2021 Housing Element sets forth 18 separate program components, which are directed at a variety of housing needs. 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 C-1 that follows summarizes the City’s housing program accomplishments. The results of this analysis will provide the basis for developing the comprehensive housing program strategy presented in Housing Plan of this section.

Table C-1
Evaluation of 2014-2021 Housing Element Programs

Programs/Objective	Accomplishments
Existing Housing and Neighborhood Conditions	
<p>1. Focus Neighborhood Revitalization/Community Building</p> <p>Objective: Acquire and rehabilitate rental units. Achieve an average of ten housing units annually, for a total of 80 units over eight years (20 extremely low-, 20 very low-, and 40 low-income units).</p>	<p>Progress: After the end of Redevelopment in 2012, the Burbank Housing Corporation (BHC), which implements Burbank’s Affordable Housing Program, expanded its efforts beyond the Focus Neighborhoods. During the 2014-2020 period, BHC acquired, rehabilitated, and/or developed the following:</p> <ul style="list-style-type: none"> ▪ Jerry’s Promise (1932 N. Ontario Street) - acquired, rehabilitated, and created three transitional housing units for homeless families. ▪ Elmwood Preservation Project Phase II (Elmwood Focus Neighborhood) -- completed rehabilitation improvements on ten affordable units. ▪ Fairview Cottages (2300 N. Fairview Street) -- acquired a three-unit property in the Golden State Neighborhood to provide affordable housing for extremely low-income households. ▪ Veterans Bungalows (1101 W. Verdugo/1108 West Angelino Avenue) -- rehabilitated and furnished 11 deed-restricted very low-income units for homeless veterans. <p>In total, BHC rehabilitated 27 affordable units during the seven-year period</p> <p>Effectiveness: This program continues to provide a multi-faceted approach to improving neighborhoods, providing a service-enriched environment, and providing affordable rental housing.</p>

	<p>Implementation of this program achieved one-third of its objective of 80 units.</p> <p>Appropriateness: This program continues to be appropriate for the Housing Element Update, providing needed affordable units even though the high cost of housing, limited funds and available properties have constrained program implementation.</p>
<p>2. Code Enforcement</p> <p>Objective: Conduct proactive neighborhood improvement activities within designated CDBG target areas.</p>	<p>Progress: As part of the City’s Building and Safety Division, Code Enforcement is responsible for the enforcement of property maintenance, zoning, unpermitted construction and business license regulations throughout the City. In 2019, there were 1,141 code enforcement cases (residential and non-residential) recorded Citywide. Of this total, 957 cases were completed, 77 cases were pending, and in 107 cases the permit expired. Many of the residential code enforcement cases were related to property maintenance, zoning compliance, and health and safety issues.</p> <p>Effectiveness: The Code Enforcement program is effective in addressing housing and property maintenance issues, especially properties in the CDBG target areas.</p> <p>Appropriateness: This is an ongoing program that is an important part of preserving the City’s aging housing stock. Code Enforcement continues to be appropriate for the Housing Element Update.</p>
<p>3. Preservation of Assisted Housing</p> <p>Objective: Preserve existing "at-risk" affordable housing stock.</p> <ul style="list-style-type: none"> ▪ Monitor At-Risk Units ▪ Support for Refinancing ▪ Rental Assistance ▪ Tenant Education 	<p>Progress: There are currently (March 2021) 1,373 deed-restricted affordable rental units in Burbank. The City monitors these affordable units on an annual basis by: maintaining contact with owners/management to ensure long-term affordability covenants are met; maintaining and updating the list of all assisted housing developments; communicating with Section 8 tenants regarding status of HUD contract renewal; providing tenant education for Section 8 recipients in the event of property owner withdrawal from Section 8 program; and promoting fair housing opportunities through owner/tenant workshops.</p> <p>Three projects were identified in the 2014-2021 Housing Element as being at potential risk of losing their long-term affordability status: Wesley Towers, Pacific Manor and Harvard Plaza. All three projected have extended their affordability covenants and are no longer considered at risk of conversion.</p> <p>Effectiveness: The City was effective in having the affordability controls extended on all three at-risk projects.</p>

	<p>Appropriateness: This is an ongoing program that is an important part of preserving the City’s long-term affordable housing units and aging housing stock. Preservation of Assisted Housing continues to be appropriate for the Housing Element Update.</p>
<p>4. Housing Choice Vouchers (Section 8 Rental Assistance)</p> <p>Objective: Maintain current levels of Section 8 funding and apply for additional funds as available. Encourage landlords to register units with the Burbank Housing Authority and undergo education on the Section 8 program</p>	<p>Progress: The Burbank Housing Authority (BHA) has increased its Section 8 allocation of 1,014 vouchers to a total of 1,049 vouchers, including targeted vouchers for VASH (Veterans Affairs Supportive Housing) and Permanent Supportive Housing. Staff applied for funding and was awarded the additional allocation to assist homeless veterans and persons needing supportive housing in the community.</p> <p>The majority of the vouchers are utilized by seniors and persons with disability. Nearly 29,000 households are on the waiting list for Section 8 rental assistance, although just 12% are current Burbank residents.</p> <p>Effectiveness: The BHA has been effective in increasing its voucher levels and adjusting program standards to maximize utilization.</p> <p>Appropriateness: It is the goal of the 2020/21-2024/25 Consolidated Plan to provide Section 8 rental assistance to 1,029 households annually (including 15 VASH vouchers); and with about 29,000 residents on the waiting list for assistance, the Section 8 Rental Assistance program continues to be appropriate for the Housing Element Update.</p>
<p>5. Condominium Conversion Program</p> <p>Objective: Consider amending the Inclusionary Housing Ordinance to include condominium conversion projects.</p>	<p>Progress: Between 2014 and 2020, there were no applications for condominium conversions and no inclusionary housing requirements imposed on condominium conversions.</p> <p>Effectiveness: Burbank’s condominium conversion regulations are effective in facilitating the creation of quality entry-level ownership housing. Existing regulations help to mitigate impacts on tenants of the units undergoing conversion by regulating noticing procedures and mandating relocation payments to cover the costs of moving.</p> <p>Appropriateness: The City’s condominium conversion regulations remain an appropriate mechanism to ensure the safety and quality of units and to help mitigate the impacts on displaced tenants. While there were no conversions during the period, the City is still considering extending the affordability requirements under the City’s Inclusionary Housing Ordinance to condominium conversions. Changes to this program will be addressed under the</p>

	Inclusionary Housing Program (#9), so a separate program is no longer necessary.
Variety of Housing Sites	
<p>6. Land Use Element and Zoning Code</p> <p>Objective: Facilitate and encourage the creation of residential mixed-use development in the Downtown area and other appropriate locations citywide. Update the Zoning Code to include development standards for residential mixed-use and small-lot development.</p>	<p>Progress: The City approved three mixed use developments in the Downtown: Talaria, First Street Village and 777 N Front Street, providing 1,089 new apartments, which included 82 deed-restricted rental units for qualified moderate income households.</p> <p>The City initiated and/or adopted the following Land Use and Zoning Code changes impacting residential uses:</p> <ul style="list-style-type: none"> ▪ Elimination of R-5 Very High Density Residential Zone and MDR-5 Media District Very High Density Residential Zone (adopted January 2015, Ord. No. 15-3,860). This Ordinance removes references to the R5 and MDR-5 zones from the Zoning Code and changed the zoning to R-4 and MDR-4, respectively. These zone changes have been reflected on the City’s Zone Map. ▪ Single-Family Development Standards and Design Guidelines (adopted January 2017, Ord. No. 17-3,890 and Reso. No. 17-28,906). This ordinance regulates bulk and mass of residential development in single-family neighborhoods. ▪ Accessory Dwelling Unit (adopted urgency interim ordinance in April 2017 and adopted an ADU ordinance in April 2018, Ord. No. 18-3,901). The ordinance amended the zoning definitions and establish development controls to allow ADUs in all residential zones consistent with State Law. Allowed ADUs to a maximum size of 500 square feet. ▪ Urgency Ordinance Extending the Residential Growth Management Provisions of Measure One Until 2030 (adopted December 2019, Ord. No. 19-3,929). This urgency ordinance extends the growth control measure originally approved by Burbank voters in 1989 for an additional 10 years. Measure One caps the maximum number of residential dwelling units at the maximum build out identified in the 1988 Land Use Element, consistent with infrastructure capacities. The Burbank2035 General Plan has a maximum build out less than the Measure One maximum build out. ▪ Accessory Dwelling Unit (adopted Interim Development Control Ordinance December 2019, Ord. No. 19-3,928 and subsequent ADU Ordinance in February 2020, Ord. No. 20-3932). This ordinance updates development standards for new ADUs and Junior ADUs consistent with recent changes in State law. Changes include allowance for ADUs of up to 850 square feet with one-bedroom and up

	<p>to 1,000 square feet for two-bedrooms, and exemption from FAR and lot coverage requirements.</p> <ul style="list-style-type: none"> ▪ Golden State Specific Plan and Burbank Center Plan Update. The City initiated the Golden State and Downtown Burbank Metrolink Station Transit Oriented Development (TOD) Specific Plans. These Plans will introduce significant additional housing in the area, and will establish development standards and design guidelines to enable compact, well designed, higher-density and mixed-use projects. <p>Effectiveness: The General Plan Land Use Element and Zoning Ordinance continue to provide opportunities for a mix of housing types -- small lot development, live-work units, and mixed-use development.</p> <p>Appropriateness: The potential for residential mixed-use development within the existing and proposed Specific Plan areas and the continued increase of ADU development make this program appropriate for the Housing Element Update.</p>
<p>7. Second Dwelling Units (“Accessory Dwelling Units”)</p> <p>Objective: Promote development of second units and monitor ADU development trends annually to evaluate if modifications are needed for City requirements.</p>	<p>Progress: New State Accessory Dwelling Unit (ADU) laws (AB 2299 and SB 1069) took effect in January 2017. These state laws made parts of the City’s secondary dwelling unit requirements null and void and established new regulations regarding on-site parking, type and size of dwelling units, setbacks, and water and sewer utility requirements for all new ADUs. In April 2018, the City’s Zoning Code was updated to incorporate new ADU regulations in compliance with State ADU laws. In February 2020 the City adopted Ord. No. 19-3,932 which established development standards regulating new ADUs and Junior ADUs in the City’s single-family and multi-family residential zones in compliance with 2020 State ADU law.</p> <p>Effectiveness: Burbank has been highly successful in producing ADUs, having issued over 280 building permits for ADUs between 2017 and 2020. A February 2020 rent survey shows that 46% of ADU rents were within the level affordable to low-income households, 10% were affordable to moderate-income households, and 44% were at levels affordable to above moderate-households.</p> <p>Appropriateness: With the new 2020 State ADU laws and the City's ADU Ordinance No. 20-3,932 designed to further facilitate production, applications for ADUs and Junior ADUs are anticipated to remain robust. This program will continue in the Housing Element Update, and pursuant to new State law, will incorporate</p>

	provisions to promote ADUs that provide affordable rents to low and moderate income households.
Development of Affordable Housing	
<p>8. Affordable Housing Development Assistance</p> <p>Objective: Provide regulatory incentives and financial assistance for affordable housing projects, especially for extremely low-income households and persons with disabilities. Also, disseminate information on sites with potential for development, inclusionary housing requirements, density bonuses, and other available incentives and concessions.</p>	<p>Progress: In 2017, the City adopted the Burbank Affordable Housing Analysis and Strategy, which describes some of the causes of the affordable housing crisis and suggests strategies/solutions to be considered by the City. The results from the Strategy helped the City Council to formulate a citywide housing goal to facilitate the building of 12,000 dwelling units during the next 15 years, focused primarily in the Downtown Burbank/Burbank Center Plan/North San Fernando Blvd. Specific Plan area, Airport District (Golden State Specific Plan) area, and parts of the Media District Specific Plan area.</p> <p>Projects with affordable housing units that received planning entitlements and/or financial assistance during the planning period included:</p> <ul style="list-style-type: none"> ▪ 601-615 East Cedar Avenue - 46 unit multi-family project provided 35% density bonus and waiver from certain development standards in exchange for eight deed-restricted very low- and low-income rental units. ▪ First Street Village – Mixed use project encompassing 261 apartments and over 21,000 square feet of retail, and including 13 moderate-income units. ▪ 777 Front Street (La Terra) – Mixed use project including 573 rental units, a 300+ room hotel, and 1,000+ square feet of retail. 69 of the units will be provided at affordable rents to moderate-income households. <p>In addition to these projects, the City provided funding assistance to BHC to acquire and rehabilitate 17 long-term affordable housing units and 10 additional units owned by BHC were also rehabilitated. The City has also entitled a 42-unit mixed-use project at 624 S. San Fernando Boulevard that will provide affordable units as part of a density bonus request and in compliance with the City’s inclusionary requirements.</p> <p>Effectiveness: The City has provided incentives to facilitate the development of 90 new affordable rental units. It is anticipated that 8 of these units will come on line during the 5th Housing Element cycle, with the balance coming on line during the 6th cycle.</p> <p>Appropriateness: As funding permits, continue to provide gap financing, regulatory incentives and concessions to private developers and non-profits to increase the supply of affordable</p>

	<p>housing. This program continues to be appropriate for the Housing Element Update.</p>
<p>9. Inclusionary Housing Ordinance</p> <p>Objective: Continue to implement the Inclusionary Housing Ordinance.</p> <ul style="list-style-type: none"> ▪ Monitor the effectiveness of the Ordinance ▪ Develop parameters for expending the in-lieu fee revenues ▪ Consider amending the Inclusionary Housing Ordinance to include condominium conversion projects 	<p>Progress: Burbank’s existing Inclusionary Housing Ordinance, adopted in 2006, requires income and affordability covenants to be imposed on 15% of the units included in new residential developments with five or more units. The ordinance had been suspended for rental housing since 2009 due to the <i>Palmer</i> decision, but with the passage of AB 1505 (the “<i>Palmer Fix</i>”), was re-instated in January 2018. In 2019, an Inclusionary Housing Study prepared by Keyser Marston Associates focused on the impacts created by the imposition of affordable housing requirements; and estimated the fee amounts that can be supported for projects that are permitted to pay a fee in lieu of producing affordable housing. Updated regulations will be considered by the Burbank City Council in 2021. While no inclusionary units were produced during the planning period, numerous projects are in the pipeline that will provide on-site inclusionary units. Smaller projects, such as the recently entitled eight-unit housing project on Naomi Avenue, are more likely to contribute an in-lieu affordable housing fee. to the requested four very low income density bonus units.</p> <p>Effectiveness: The City continues to apply its existing inclusionary housing regulations for applicable rental and ownership projects.</p> <p>Appropriateness: The Inclusionary Housing Ordinance and Program can provide an important tool for increasing the number of affordable housing units in the City, and continues to be appropriate for the Housing Element Update.</p>
<p>10. Housing for Persons with Disabilities</p> <p>Objective: Support construction and rehabilitation of housing targeted for persons with disabilities.</p>	<p>Progress: The City provided financial support to BHC to develop Burbank Veteran Bungalows. This 11-unit property offers formerly homeless veterans affordable housing and supportive services provided through New Directions for Veterans (NDVets). Two units were redesigned for full ADA accessibility.</p> <p>Effectiveness: City has implemented its reasonable accommodation ordinance (adopted in 2009) and has complied with ADA requirements.</p> <p>Appropriateness: This program continues to be appropriate for the Housing Element Update.</p>
<p>11. Sustainability and Green Building</p>	<p>Progress: The City has adopted the 2019 California Building Standards Code, including the California Energy Code and the CALGreen Code. Each of these codes have increased measures for</p>

<p>Objective: Implement Sustainability Action Plan and Greenhouse Gas Reduction Plan and encourage green building practices in new construction and rehab projects.</p>	<p>energy efficiency, resource conservation, green building, and sustainability. Large development projects, such as the mixed-use projects being developed at Avion Burbank and the 777 N. Front Street include project design features that involve energy efficiency and green building design. Single-family residential homes continue to install solar photovoltaic systems and electric vehicle charging units, which are processed through building permits.</p> <p>Effectiveness: The Building and Safety Division has implemented CALGreen and provided information to the public about green building via the website and brochures handed out at the public counter.</p> <p>Appropriateness: CAL Green (Title 24) building code standards continue to be implemented through the Burbank Building and Safety Division. This program continues to be appropriate for the Housing Element Update.</p>
<p>Remove Constraints to Housing</p>	
<p>12. Transitional and Supportive Housing</p> <p>Objective: To comply with State law, the City will amend the Zoning Ordinance for transitional and supportive housing to be considered a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.</p>	<p>Progress: The City has updated its Zoning Ordinance consistent with State law to treat transitional and supportive housing as a residential use, and to allow supportive housing as a use by right in all zones where multi-family and mixed use is permitted.</p> <p>Between 2014-2020, the Burbank Housing Corporation (BHC) created a total of 17 transitional housing units for adults, youth, and families with children. In 2017, the City entered into a new partnership with Hope of the Valley by adding 38 beds of transitional congregate housing for transitional aged youth experiencing homelessness. Supportive services are offered through Village Family Services in order to stabilize the persons housing needs.</p> <p>Effectiveness: The City has been highly effective in expanding its supply of transitional and supportive housing.</p> <p>Appropriateness: The City, in cooperation with the Burbank Housing Corporation (BHC), remains committed to expanding transitional and supportive housing opportunities to persons experiencing homelessness or at-risk of becoming homeless.</p>
<p>13. Development Standards and Procedures</p> <p>Objectives: Encourage mixed use developments through implementation of</p>	<p>Progress: With funds from the Southern California Association of Governments (SCAG) in 2016, the City initiated the preparation of development standards for mixed-used places. After City staff conducted a number of public workshops and City Council/ Planning Board study sessions on mixed-use design standards, the</p>

<p>mixed use development standards and revisions to the Zoning Ordinance. Review the City's development review and approval process.</p>	<p>City will now consider incorporating these standards in the Burbank Center Plan Update and the Golden State Specific Plan.</p> <p>The City also approved the following mixed-use projects within the planning period:</p> <ul style="list-style-type: none"> ▪ First Street Village Mixed-Use Development Project - This project consists of three six-story mixed-use development retail commercial space and 261 multifamily apartments. ▪ 777 Front Street "La Terra" - The Project includes retail and hotel uses and 573 residential (rental) units on a vacant seven-acre site. ▪ Talaria Mixed Use Development at 3401 W. Olive Avenue - This mixed-use project includes 241 residential rental units, a 42,950 square foot supermarket, and 760 parking spaces on 3.86 acres of land. <p>Effectiveness: Three mixed-use projects, totaling 1,075 rental units have been approved by the City since the beginning of 2014.</p> <p>Appropriateness: With the Burbank Center Plan Update and the Golden State Specific Plan considering these mixed-use development standards, this program continues to be relevant for the Housing Element Update.</p>
<p>14. Fair Housing</p> <p>Objective: Continue to contract with a qualified fair housing service, provide information on fair housing to Burbank residents and property owners, and promote fair housing practices.</p>	<p>Progress: Beginning in 2017, the City entered into a contract with the Housing Rights Center (HRC) to provide housing discrimination assistance and tenant/landlord information. HRC also offers fair housing education and outreach; fair housing investigation and enforcement; monitoring of real estate and lending activities; and assistance in implementation of Burbank's Fair Housing Plan.</p> <p>During 2017-2019, HRC handled 40 discrimination complaint inquiries in Burbank, just three of which rose to the level of a discrimination case. During this same three-year period, HRC handled complaints or requests for assistance involving 220 Burbank tenants or landlords. HRC has been able to resolve roughly 65% of the complainant's issues, with the remainder of complainants referred to an outside agency such as Legal Aid. Burbank is currently updating its Fair Housing Plan ("Analysis of Impediments to Fair Housing Choice") which will guide the City's fair housing activities for the ensuing five years.</p> <p>Effectiveness: The City's fair housing program is effective in providing services and education regarding housing discrimination and tenant/landlord rights and responsibilities.</p>

	<p>Appropriateness: The Fair Housing Program provides an important service to residents and landlords in the community, and remains appropriate for the Housing Element Update.</p>
<p>15. Landlord/Tenant Mediation</p> <p>Objective: Offer conflict mediation services through Landlord-Tenant Commission.</p>	<p>Progress: The Landlord-Tenant Commission meets on the first Monday of each month to educate and assist in resolving issues between landlords and tenants. During 2019, the Commission held various public information meetings on the State’s AB 1482 rent control regulations that took effect on January 1, 2020.</p> <p>In addition, due to the Covid-19 pandemic, the City approved an Urgency Ordinance on March 17, 2020 prohibiting the evictions of residential and commercial tenants for non-payment of rent caused by the Corona virus. The eviction moratorium was extended through July 31st with amendments; including certain qualified commercial tenants. Furthermore, the City Council approved a Rent Repayment Ordinance in April 2020 that allows the repayment of back due rent, late fees/penalties to November 30, 2020, unless further extended by action of the City Council.</p> <p>Effectiveness: The Landlord-Tenant Commission is effective in helping to mediate the disputes brought before it, and serves an important role in promoting the rights of both tenants and landlords in the Burbank community.</p> <p>Appropriateness: The Landlord-Tenant Mediation Program provides a critical service to residents and landlords, especially with rising homelessness and the potential issues resulting from the current Covid-19 pandemic. This program continues to be appropriate for the Housing Element Update.</p>
<p>16. Emergency Shelter and Emergency Services</p> <p>Objective: Explore opportunities for supportive services programs and partnerships to leverage funds; provide funding support to agencies offering homeless services to Burbank’s homeless and at-risk population.</p>	<p>Progress: During the Housing Element planning period, the City participated in the following activities addressing homelessness:</p> <ul style="list-style-type: none"> ▪ The regional Winter Shelter Program operated by Hope of the Valley in Pacoima from December - March, which provides a shuttle van pick-up and drop-off at the Downtown Burbank Metrolink Station. ▪ Working together with local, County, and City of Los Angeles partners, the City of Burbank adopted a comprehensive Homeless Plan for 2018-2021. The Homeless Plan provides a proactive approach to homelessness by: 1) creating action oriented solutions that address the ongoing systemic social issues of homelessness impacting our community; 2) coordinating efforts to address homelessness with City Departments, public and private entities, businesses, and community involvement; and 3) identifying funding, barriers, and measurable

	<p>outcomes. The City has implemented multiple strategies identified in the Homeless Plan, including:</p> <ul style="list-style-type: none"> ✓ Preparing a feasibility study for interim or permanent housing; ✓ Preparing a feasibility study for the acquisition and conversion of a commercial space into an access center and shelter; ✓ Conducting a study of City-owned plots of land for potential use as a safe storage facility; ✓ Hiring a Homeless Services Liaison to educate the public regarding the City’s Homelessness efforts and engaging with the homeless; and ✓ Extending the partnership with Hope of the Valley to provide a winter shelter pick-up/drop-off from December 1, 2019 to March 30, 2020. <ul style="list-style-type: none"> ▪ The City of Burbank, along with several other cities, advocated for future Measure H Homelessness grants to implement homelessness plans. These efforts led to the release of a Cities’ Homelessness Plan Implementation - Request for Funding Proposal (RFP). Los Angeles County and Home For Good Funder’s Collaborative (HFG) released an RFP soliciting proposals for city-specific projects to increase the supply of interim or permanent supportive housing and to enhance the County service systems for those experiencing homelessness. ▪ In 2019, the Downtown Business Improvement District approved a 12-month contract with Streetplus to dedicate homeless outreach in downtown Burbank. <p>Effectiveness: The City has been effective in its support of local homeless service providers, and partnering with other cities in addressing the homelessness issue.</p> <p>Appropriateness: According to the 2019 Point-In-Time Homeless Count, the homeless population in the City was estimated to include 282 individuals. This program continues to be important for the Housing Element Update, and will be retitled “Homeless and Housing Services”.</p>
<p>17. Accessible Housing and Universal Design</p> <p>Objective: Explore incentives for residential projects that include universal design features.</p>	<p>Progress: The City routinely adopts updates to Uniform Building and Housing Codes to reflect current accessibility requirements in new construction.</p> <p>Effectiveness: The City also implements the reasonable accommodation ordinance, which was adopted in 2009.</p> <p>Appropriateness: Compliance with accessibility requirements is a standard building code requirement. As part of the Downtown Burbank/Burbank Center Plan Update and Golden State Specific</p>

	<p>Plan development process, the City will consider universal design guidelines and standards. This program will be broadened to encompass housing for person with disabilities in the updated Housing Element.</p>
<p>18. Residential Lifeline Program</p> <p>Objective: Continue to offer reduced utility rates to very low-income seniors and disabled residents.</p>	<p>Progress: The Burbank Water and Power’s Lifeline Program offers an exemption from the monthly customer service charge, the utility users tax, and a reduced rate on electric service to income-qualified seniors and persons with disabilities. Description and application for the Lifeline Program is on the Burbank Water and Power website: https://www.burbankwaterandpower.com/my-home/lifeline-program</p> <p>Effectiveness: This program is an effective way of reducing the housing costs for Burbank’s special needs populations – low-income seniors and persons with disabilities.</p> <p>Appropriateness: The “Opportunities for Energy Conservation” section of the Resources chapter of the Housing Element presents the variety of sustainability programs offered through the City and Burbank Water and Power (BWP). A separate program for BWP’s Residential Lifeline Program is no longer necessary for the Housing Element update.</p>

The Table below summarizes the quantified objectives contained in the City’s 2014-2021 Housing Element, and compares the City’s progress in fulfilling these objectives:

Table C-2
Progress Towards 2014-2021 Quantified Objectives

Income Level	New Construction (2014-2020)		Rehabilitation (2014-2020)		Preservation	
	Goal	Progress	Goal	Progress	Goal	Progress
Extremely Low	347	--	--	8	212	212
Very Low	347	--	20	7	212	212
Low	413	115	20	13		
Moderate	443	29	40	--		
Above Moderate	1,134	553	--	--		
Total	2,684	697	80	28	414	414

New construction goal reflects Burbank’s 2014-2021 RHNA. Of allocation for 694 very low income units, half is allocated to extremely low income and half to very low income households.

Rehabilitation goal and progress reflects the Focus Neighborhood Revitalization Program.

Conservation goal and progress reflects the City’s units at risk of conversion to market rate.

Housing Element statutes now require jurisdictions to evaluate the effectiveness of the Element’s programs in meeting the needs of special needs households. Burbank implemented numerous programs during the 5th cycle planning period that assisted special needs populations, including:

- Providing 11 affordable housing units for homeless veterans, 3 transitional housing units for homeless families, a 38 bed shared housing facility for transitional age youth (ages 18-24), 20 dedicated rental vouchers for formerly homeless and 15 dedicated vouchers for veterans, and rapid re-housing through temporary rent assistance and case management
- Continuing to fund a year-round homeless street outreach program
- Dedicating future funds for establishment of a Tiny Home Village of modular homes on public land for approximately 20 homeless households
- Funding counseling services to families fleeing domestic violence and residing in transitional housing programs operated by Family Service Agency
- Funding programs designed to benefit developmentally disabled adults and children by providing access to employment opportunities, life skills, and case management
- Preserving 149 units of affordable senior rental housing at-risk of conversion to market rate
- Providing rental assistance vouchers to approximately 700 very low income seniors
- Adopting an accessory dwelling unit (ADU) ordinance and updates to facilitate the addition of ADUs which can benefit seniors, persons with disabilities and female-headed households
- Funding the addition of six rent-restricted ADUs on BHC affordable housing sites

Appendix D

Housing Element Site Inventory

Table D-1
Housing Element Site Inventory: Housing Opportunity Sites
Current General Plan

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Realistic GP Net DUs
DOWNTOWN TOD SPECIFIC PLAN SITES									
TOD 1-Carl's Jr		2460010010	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%	2.3
TOD 1-Carl's Jr		2460010011	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%	2.3
TOD 1-Carl's Jr		2460010012	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%	2.3
TOD 1-Carl's Jr		2460010013	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%	2.3
TOD 1-Carl's Jr	1300 N SAN FERNANDO BLVD	2460010014	Corridor Commercial	NSFC	27	0.21	Restaurant	70%	4.0
TOD 1-Carl's Jr	1310 N SAN FERNANDO BLVD	2460010033	Corridor Commercial	NSFC	27	0.13	Restaurant	70%	2.4
TOD 1-Carl's Jr	1320 N SAN FERNANDO BLVD	2460010036	Corridor Commercial	NSFC	27	0.65	Restaurant	70%	11.3
Total						1.29		70%	26.0
TOD 2-Kmart	1000 N SAN FERNANDO BLVD	2460006045	Corridor Commercial	NSFC	27	2.80	Store	60%	45.4
TOD 2-Kmart	1000 N SAN FERNANDO BLVD	2460007036	Corridor Commercial	NSFC	27	3.63	Disc. depart store	60%	58.9
Total						6.43		60%	104.0
TOD 3-Caltrans/IHOP	923 N SAN FERNANDO BLVD	2460021017	Corridor Commercial	NSFC	27	0.26	Parking lot/patron	70%	4.8
TOD 3-Caltrans/IHOP	913 N SAN FERNANDO BLVD	2460021018	Corridor Commercial	NSFC	27	0.17	Restaurant	70%	3.2
TOD 3-Caltrans/IHOP	911 N SAN FERNANDO BLVD	2460021019	Corridor Commercial	NSFC	27	0.17	Restaurant	70%	2.3
TOD 3-Caltrans/IHOP	903 N SAN FERNANDO BLVD	2460021020	Corridor Commercial	NSFC	27	0.30	Prof. building	70%	5.7
TOD 3-Caltrans/IHOP	901 N SAN FERNANDO BLVD	2460021027	Corridor Commercial	NSFC	27	0.26	Full service station	70%	4.9
TOD 3-Caltrans/IHOP	127 W BURBANK BLVD	2460021028	Corridor Commercial	NSFC	27	0.13	Store	70%	2.5
TOD 3-Caltrans/IHOP	CALTRANS PROPERTY	N/A	N/A		0	1.58	Vacant	70%	
Total						2.87		70%	23.0
TOD 4-Old IKEA	600 N SAN FERNANDO BLVD	2460023044	Downtown	PD	87	6.38	Reg. shopping	70%	388.7
TOD 4-Old IKEA	731 N SAN FERNANDO BLVD	2460023045	Downtown	PD	87	0.90	Reg. shopping	70%	55.0
TOD 4-Old IKEA	601 N SAN FERNANDO BLVD	2460023046	Downtown	PD	87	2.81	Reg. shopping	70%	170.9
TOD 4-Old IKEA	600 N 1ST ST	2460023047	Downtown	PD	87	0.29	Reg. shopping	70%	17.9
TOD 4-Old IKEA	230 E BURBANK BLVD	2460023060	Downtown	PD	87	1.67	Reg. shopping	70%	101.8

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Realistic GP Net DUs
TOD 4-Old IKEA	217 GRINNELL DR	2460031007	Downtown	BCC-2	87	0.19	Parking lot/patron	70%	11.5
TOD 4-Old IKEA	215 GRINNELL DR	2460031008	Downtown	BCC-2	87	0.19	Parking lot/patron	70%	11.5
TOD 4-Old IKEA	218 E BURBANK BLVD	2460031016	Downtown	BCC-2	87	0.17	Parking lot/patron	70%	10.1
TOD 4-Old IKEA	212 E BURBANK BLVD	2460031018	Downtown	BCC-2	87	0.19	Parking lot/patron	70%	11.7
TOD 4-Old IKEA	800 N SAN FERNANDO BLVD	2460031019	Downtown	BCC-2	87	0.24	Bank/savings	70%	14.7
TOD 4-Old IKEA	840 N SAN FERNANDO BLVD	2460031029	Downtown	BCC-2	87	0.16	Bank/savings	70%	9.6
TOD 4-Old IKEA		2460031044	Downtown	BCC-2	87	0.16	Vacant	70%	9.8
TOD 4-Old IKEA	800 N SAN FERNANDO BLVD	2460031045	Downtown	BCC-2	87	0.44	Fast food-walkup	70%	26.8
Total						13.80		70%	839.0
TOD 5-Ashley Home/El Pollo	401 N 1ST ST	2460023056	Downtown	PD	87	2.06	Reg. shopping	70%	125.5
TOD 5-Ashley Home/El Pollo	521 N 1ST ST	2460023057	Downtown	PD	87	0.65	Reg. shopping	70%	39.4
Total						2.71		70%	164.0
TOD 6-Burbank Town Ctr	245 E MAGNOLIA BLVD	2460023048	Downtown	PD	87	1.31	Reg. shopping	70%	79.5
TOD 6-Burbank Town Ctr	201 E MAGNOLIA BLVD	2460023049	Downtown	PD	87	5.20	Reg. shopping	70%	316.5
TOD 6-Burbank Town Ctr	111 E MAGNOLIA BLVD	2460023050	Downtown	PD	87	1.41	Reg. shopping	70%	86.2
TOD 6-Burbank Town Ctr	501 N 3RD ST	2460023052	Downtown	PD	87	2.23	Reg. shopping	70%	135.9
TOD 6-Burbank Town Ctr	550 N 1ST ST	2460023054	Downtown	PD	87	2.71	Reg. shopping	70%	165.3
TOD 6-Burbank Town Ctr	200 E CYPRESS AVE	2460023063	Downtown	PD	87	2.35	Reg. shopping	70%	143.3
TOD 6-Burbank Town Ctr	(PRIV STREET AND YARD IMPS)	2460023064	Downtown	PD	87	1.26	Private Street	70%	76.9
TOD 6-Burbank Town Ctr	555 N 3RD ST	2460023996	Downtown	PD	87	0.27	Theater	70%	16.4
Total						16.75		70%	1,020.0
TOD 7-Civic Center		2453008900	Institutional	PD	0	0.08	Parking lot lease	70%	
TOD 7-Civic Center		2453008903	Institutional	PD	0	0.89	Gov't owned	70%	
TOD 7-Civic Center	348 E ORANGE GROVE AVE	2453008905	Institutional	PD	0	0.36	Store/resid combo	70%	
TOD 7-Civic Center	301 E OLIVE AVE	2453008908	Institutional	PD	0	0.53	Bank/savings	70%	
TOD 7-Civic Center	375 E OLIVE AVE	2453008910	Institutional	PD	0	0.17	Parking lot/patron	70%	
TOD 7-Civic Center		2453008911	Institutional	PD	0	0.20	Parking lot/patron	70%	
TOD 7-Civic Center	374 E ORANGE GROVE AVE	2453008912	Institutional	PD	0	0.66	Bank/savings	70%	
TOD 7-Civic Center (City Hall)	275 E OLIVE AVE	2453009902	Institutional	PD	0	1.79	City Hall/Admin Ctr	70%	

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Realistic GP Net DUs
TOD 7-Civic Center	110 N GLENOAKS BLVD	2455021906	Institutional	R-4	0	1.56	Central Library	70%	
Total						6.24		70%	
TOD 8-Olive/Glenoaks	121 S GLENOAKS BLVD	2453014002	Downtown	BCC-3	87	0.08	Prof building	70%	4.9
TOD 8-Olive/Glenoaks	123 S GLENOAKS BLVD	2453014003	Downtown	BCC-3	87	0.04	Store/resid combo	70%	2.4
TOD 8-Olive/Glenoaks	147 S GLENOAKS BLVD	2453014008	Downtown	BCC-3	87	0.09	Store	70%	2.3
TOD 8-Olive/Glenoaks	356 E OLIVE AVE	2453014012	Downtown	BCC-2	87	0.18	Prof building	70%	10.8
TOD 8-Olive/Glenoaks	348 E OLIVE AVE	2453014014	Downtown	BCC-2	87	0.18	Office building	70%	10.9
TOD 8-Olive/Glenoaks	362 E OLIVE AVE	2453014022	Downtown	BCC-2	87	0.06	Store	70%	3.8
TOD 8-Olive/Glenoaks	358 E OLIVE AVE	2453014023	Downtown	BCC-2	87	0.12	Office building	70%	7.0
TOD 8-Olive/Glenoaks	137 S GLENOAKS BLVD	2453014024	Downtown	BCC-3	87	0.16	Restaurant	70%	7.8
TOD 8-Olive/Glenoaks	372 E OLIVE AVE	2453014025	Downtown	BCC-3	87	0.13	Bank/savings	70%	7.8
TOD 8-Olive/Glenoaks	359 E ANGELENO AVE	2453014026	Downtown	BCC-2	87	0.17	Parking lot/patron	70%	10.5
TOD 8-Olive/Glenoaks	353 E ANGELENO AVE	2453014029	Downtown	BCC-2	87	0.35	Office building	70%	20.4
Total						1.55		70%	88.0
TOD 9-Fosters Freeze/Salvation Army	249 S GLENOAKS BLVD	2453021026	Downtown	BCC-3	87	0.19	Auto serv/body	70%	11.8
TOD 9-Fosters Freeze/Salvation Army	249 S GLENOAKS BLVD	2453021027	Downtown	BCC-3	87	0.09	Auto serv/body	70%	5.3
TOD 9-Fosters Freeze/Salvation Army	201 S GLENOAKS BLVD	2453021029	Downtown	BCC-3	87	0.25	Restaurant	70%	15.4
TOD 9-Fosters Freeze/Salvation Army	221 S GLENOAKS BLVD	2453021030	Downtown	BCC-3	87	0.21	Store	70%	12.5
TOD 9-Fosters Freeze/Salvation Army	354 E ANGELENO AVE	2453021032	High Density Residential	BCC-2	43	0.17	Prof building	70%	5.2
TOD 9-Fosters Freeze/Salvation Army	344 E ANGELENO AVE	2453021033	High Density Residential	BCC-2	43	0.17	Prof building	70%	5.3
TOD 9-Fosters Freeze/Salvation Army	336 E ANGELENO AVE	2453021035	High Density Residential	BCC-2	43	0.18	Private school	70%	5.3
TOD 9-Fosters Freeze/Salvation Army	320 E ANGELENO AVE	2453021041	High Density Residential	BCC-2	43	0.17	Church	70%	5.2
TOD 9-Fosters Freeze/Salvation Army	310 E ANGELENO AVE	2453021046	High Density Residential	BCC-2	43	0.35	Parking lot/patron	70%	10.6
TOD 9-Fosters Freeze/Salvation Army	300 E ANGELENO AVE	2453021062	High Density Residential	BCC-2	43	0.15	Church	70%	4.7

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Realistic GP Net DUs
Total						1.94		70%	81.0
TOD-10-BJs/Black Angus	101 S 1ST ST, 400	2453011029	Downtown	BCC-2	87	2.12	Office building	70%	129.3
TOD-10-BJs/Black Angus	235 S 1ST ST	2453018017	Downtown	BCC-2	87	1.71	Restaurant	70%	103.0
Total						3.83		70%	232.0
TOD 11-Victory/Olive	120 S VICTORY BLVD	2451016011	North Victory	BCCM	27	2.14	Office building	70%	37.4
TOD 11-Victory/Olive	272 E OLIVE AVE	2451016012	North Victory	BCCM	27	0.24	Auto serv/body	70%	3.5
TOD 11-Victory/Olive	264 W OLIVE AVE	2451016013	North Victory	BCCM	27	0.19	Auto serv/body	70%	3.7
TOD 11-Victory/Olive	110 S VICTORY BLVD	2451016014	North Victory	BCCM	27	0.31	Auto serv/body	70%	5.8
Total						2.90		70%	50.0
TOD 12-YMCA	353 E SAN JOSE AVE	2460034021	Downtown	BCC-2	87	0.35	Private school	70%	21.0
TOD 12-YMCA	409 N GLENOAKS BLVD	2460035001	Downtown	BCC-3	87	0.11	Parking lot/patron	70%	6.5
TOD 12-YMCA	369 E MAGNOLIA BLVD	2460035003	Downtown	BCC-3	87	0.18	Restaurant	70%	10.8
TOD 12-YMCA	361 E MAGNOLIA BLVD	2460035005	Downtown	BCC-2	87	0.17	Office building	70%	10.5
TOD 12-YMCA	353 E MAGNOLIA BLVD	2460035007	Downtown	BCC-2	87	0.17	Store/resid combo	70%	10.6
TOD 12-YMCA	352 E SAN JOSE AVE	2460035008	Downtown	BCC-2	87	0.18	Parking lot/patron	70%	10.8
TOD 12-YMCA	320 E SAN JOSE AVE	2460035014	Downtown	PD	87	0.28	Parking lot/patron	70%	17.1
TOD 12-YMCA	300 E SAN JOSE AVE	2460035016	Downtown	PD	87	0.33	Parking lot/patron	70%	20.2
TOD 12-YMCA	344 E SAN JOSE AVE	2460035017	Downtown	PD	87	0.36	Private school	70%	21.9
TOD 12-YMCA	321 E MAGNOLIA BLVD	2460035018	Downtown	PD	87	0.53	Club/Lodge Hall	70%	32.4
Total						2.66		70%	161.0
GOLDEN STATE SPECIFIC PLAN SITES									
GSSP-1 Lima/Avon	3075 N LIMA ST	2466001015	Golden State	M-2	27	0.16	Light industrial	70%	3.0
GSSP-1 Lima/Avon	3079 N LIMA ST	2466001016	Golden State	M-2	27	0.16	Light industrial	70%	2.9
GSSP-1 Lima/Avon	3310 COHASSET ST	2466001022	Golden State	M-2	27	0.15	Light industrial	70%	2.9
GSSP-1 Lima/Avon	3094 N AVON ST	2466001023	Golden State	M-2	27	0.15	Light industrial	70%	2.9
GSSP-1 Lima/Avon	3090 N AVON ST	2466001024	Golden State	M-2	27	0.15	Light industrial	70%	2.9
GSSP-1 Lima/Avon	3086 N AVON ST	2466001025	Golden State	M-2	27	0.31	Light industrial	70%	4.8
GSSP-1 Lima/Avon	3080 N AVON ST	2466001026	Golden State	M-2	27	0.18	Light industrial	70%	3.4

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Realistic GP Net DUs
GSSP-1 Lima/Avon	3071 N LIMA ST	2466001029	Golden State	M-2	27	0.15	Light industrial	70%	2.8
GSSP-1 Lima/Avon	3083 N LIMA ST	2466001030	Golden State	M-2	27	0.31	Warehouse, storage	70%	5.8
GSSP-1 Lima/Avon	3059 N CALIFORNIA ST	2466001045	Golden State	M-2	27	0.15	Vacant	70%	2.8
GSSP-1 Lima/Avon	3063 N CALIFORNIA ST	2466001046	Golden State	M-2	27	0.16	Vacant	70%	3.1
GSSP-1 Lima/Avon	3300 N SAN FERNANDO BLVD	2466001063	Golden State	M-2	27	0.51	Warehouse, storage	70%	9.7
GSSP-1 Lima/Avon	3089 N LIMA ST	2466001064	Golden State	M-2	27	0.16	Warehouse, storage	70%	2.9
GSSP-1 Lima/Avon	3099 N LIMA ST	2466001077	Golden State	M-2	27	0.31	Light industrial	70%	6.0
GSSP-1 Lima/Avon	3320 N SAN FERNANDO BLVD	2466001081	Golden State	M-2	27	0.99	Light industrial	70%	18.7
Total						4.00		70%	74.0
GSSP-2 N. Hollywood Way	3333 N SAN FERNANDO BLVD	2466005003	Golden State	M-2	27	0.89	Light industrial	80%	19.1
GSSP-2 N. Hollywood Way	3207 N SAN FERNANDO BLVD	2466005013	Golden State	M-2	27	0.50	Light industrial	80%	10.9
GSSP-2 N. Hollywood Way		2466005017	Golden State	M-2	27	0.20	Parking lot/structure	80%	4.3
GSSP-2 N. Hollywood Way		2466005018	Golden State	M-2	27	0.23	Parking lot/structure	80%	4.9
GSSP-2 N. Hollywood Way	3303 N SAN FERNANDO BLVD	2466005024	Golden State	M-2	27	1.33	Light industrial	80%	28.7
GSSP-2 N. Hollywood Way	3301 N SAN FERNANDO BLVD	2466005025	Golden State	M-2	27	1.26	Light industrial	80%	27.3
GSSP-2 N. Hollywood Way	3024 N HOLLYWOOD WAY	2466006002	Golden State	M-2	27	0.07	Light industrial	80%	0.4
GSSP-2 N. Hollywood Way	3022 N HOLLYWOOD WAY	2466006003	Golden State	M-2	27	0.06	Light industrial	80%	1.4
GSSP-2 N. Hollywood Way	3020 N HOLLYWOOD WAY	2466006004	Golden State	M-2	27	0.06	Light industrial	80%	1.3
GSSP-2 N. Hollywood Way	3018 N HOLLYWOOD WAY	2466006005	Golden State	M-2	27	0.07	Light industrial	80%	1.4
GSSP-2 N. Hollywood Way	3016 N HOLLYWOOD WAY	2466006006	Golden State	M-2	27	0.06	Light industrial	80%	1.4
GSSP-2 N. Hollywood Way	3014 N HOLLYWOOD WAY	2466006007	Golden State	M-2	27	0.06	Light industrial	80%	1.4
GSSP-2 N. Hollywood Way	3012 N HOLLYWOOD WAY	2466006008	Golden State	M-2	27	0.06	Light industrial	80%	1.3
GSSP-2 N. Hollywood Way		2466006009	Golden State	M-2	27	0.06	Parking lot/structure	80%	1.4
GSSP-2 N. Hollywood Way		2466006010	Golden State	M-2	27	0.06	Parking lot/structure	80%	1.4
GSSP-2 N. Hollywood Way	3000 N HOLLYWOOD WAY	2466006011	Golden State	M-2	27	0.30	Warehouse, storage	80%	6.5
Total						5.28		80%	113.0

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Realistic GP Net DUs
GSSP-3 Valhalla	2210 N SCREENLAND DR	2463001005	Golden State	M-1	27	3.04	Light industrial	70%	57.5
GSSP-3 Valhalla	2211 N HOLLYWOOD WAY	2463001006	Golden State	M-1	27	0.34	Light industrial	70%	6.5
GSSP-3 Valhalla	2205 N HOLLYWOOD WAY	2463001007	Golden State	M-1	27	0.34	Light industrial	70%	5.4
GSSP-3 Valhalla	2201 N HOLLYWOOD WAY	2463001008	Golden State	M-1	27	0.34	Light industrial	70%	5.4
GSSP-3 Valhalla	3520 W VALHALLA DR	2463001011	Golden State	M-1	27	2.41	Light industrial	70%	45.5
GSSP-3 Valhalla	2231 N HOLLYWOOD WAY	2463001012	Golden State	M-1	27	1.64	Light industrial	70%	30.9
Total						8.10		70%	151.0
GSSP-4 Logix	2340 N HOLLYWOOD WAY	2463010001	Golden State	M-2	27	4.46	Office building	80%	96.0
GSSP-5 Ontario		2464004036	Regional Commercial	PD	58	1.73	Parking lot/structure	80%	80.0
GSSP-6 Fairview		2464006045	Regional Commercial	M-2	58	0.65	Parking lot/structure	80%	30.0
GSSP-7 Empire	3030 W EMPIRE AVE	2464001002	Regional Commercial	M-2	58	0.39	Light industrial	80%	18.2
GSSP-7 Empire	3020 W EMPIRE AVE	2464001003	Regional Commercial	M-2	58	0.41	Light industrial	80%	18.9
GSSP-7 Empire	2820 W EMPIRE AVE	2464001007	Regional Commercial	M-2	58	0.74	Heavy industrial	80%	34.3
GSSP-7 Empire	3110 W EMPIRE AVE	2464001015	Regional Commercial	M-2	58	0.82	Office building	80%	38.2
GSSP-7 Empire	3000 W EMPIRE AVE	2464001019	Regional Commercial	M-2	58	1.98	Light industrial	80%	91.6
GSSP-7 Empire	2890 W EMPIRE AVE	2464001020	Regional Commercial	M-2	58	0.86	Light industrial	80%	40.0
GSSP-7 Empire	3120 W EMPIRE AVE	2464001021	Regional Commercial	M-2	58	1.13	Warehouse, storage	80%	51.4
GSSP-7 Empire		2464001906	Institutional	RR	0	0.06	Government, public	80%	
Total						6.4		80%	292.0
TOTAL HOUSING OPPORTUNITY SITES						93.70			3,624.0

Table D-2
Housing Element Site Inventory
Entitlement or Pending Entitlement Projects

Project ID	Address	General Plan	Zoning	DUs	Net DUs
Entitled Projects					
Former Fry's Site	2311 N. HOLLYWOOD WAY	Regional Commercial	C-3	863	863
La Terra	777 FRONT STREET	Downtown Commercial	PD 17-01	573	573
First Street Village	315 N. FIRST STREET (16 PARCELS)	Downtown Commercial	PD 14-01	275	275
3700 Riverside	3700 RIVERSIDE DR.	Media District Commercial	MDC-3	49	49
S. San Fernando/Cedar	624-628 S. SAN FERNANDO BLVD.	South San Fernando Commercial	BCC-3	42	42
530 E. San Jose Ave.	530 E. SAN JOSE AVE.			4	2
Cedar Ave Apartments	610-615 E. CEDAR AVE.	High Density Residential	R-4	46	32
Naomi Apts	2321-2325 N. NAOMI ST.	Medium Density Residential	R-4	8	6
Cypress	565 E. CYPRESS AVE	High Density Residential	R-4	3	3
214 N. Orchard	214 N. ORCHARD	Low Density Residential	R-2	5	2
Total Entitled Units				1,904	1,845
Pending Projects					
Bob Hope Center Project	3201 W. OLIVE AVE.	Media District Commercial	PD 2001-2	123	123
The Premier on First	103 E. VERDUGO AVE.	Downtown Commercial	BCC-2	154	154
Palm Ave	529-537 E. PALM	High Density Residential	R-4	24	19
4100 Riverside	4100 RIVERSIDE	Media District Commercial	MDC-3	44	44
Thornton Condos	2720 THORNTON AVE.	High Density Residential	R-4	4	2
2814 W. Empire	2814 W. EMPIRE	Regional Commercial	M-2	148	148
Total Pending Units				497	490

Table D-3
Housing Element Site Inventory: Housing Opportunity Sites
Proposed Downtown TOD and Golden State Specific Plans

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Prop SP Max Density	Realistic SP Net DUs
DOWNTOWN TOD SPECIFIC PLAN SITES										
TOD 1-Carl's Jr		2460010010	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%		
TOD 1-Carl's Jr		2460010011	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%		
TOD 1-Carl's Jr		2460010012	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%		
TOD 1-Carl's Jr		2460010013	High Density Residential	NSFC	43	0.08	Parking lot/patron	70%		
TOD 1-Carl's Jr	1300 N SAN FERNANDO BLVD	2460010014	Corridor Commercial	NSFC	27	0.21	Restaurant	70%		
TOD 1-Carl's Jr	1310 N SAN FERNANDO BLVD	2460010033	Corridor Commercial	NSFC	27	0.13	Restaurant	70%		
TOD 1-Carl's Jr	1320 N SAN FERNANDO BLVD	2460010036	Corridor Commercial	NSFC	27	0.65	Restaurant	70%		
Total						1.29		70%		26.0
TOD 2-Kmart	1000 N SAN FERNANDO BLVD	2460006045	Corridor Commercial	NSFC	27	2.80	Store	60%		
TOD 2-Kmart	1000 N SAN FERNANDO BLVD	2460007036	Corridor Commercial	NSFC	27	3.63	Disc. depart store	60%		
Total						6.43		60%		104.0
TOD 3-Caltrans/IHOP	923 N SAN FERNANDO BLVD	2460021017	Corridor Commercial	NSFC	27	0.26	Parking lot/patron	70%		
TOD 3-Caltrans/IHOP	913 N SAN FERNANDO BLVD	2460021018	Corridor Commercial	NSFC	27	0.17	Restaurant	70%		
TOD 3-Caltrans/IHOP	911 N SAN FERNANDO BLVD	2460021019	Corridor Commercial	NSFC	27	0.17	Restaurant	70%		
TOD 3-Caltrans/IHOP	903 N SAN FERNANDO BLVD	2460021020	Corridor Commercial	NSFC	27	0.30	Prof. building	70%		
TOD 3-Caltrans/IHOP	901 N SAN FERNANDO BLVD	2460021027	Corridor Commercial	NSFC	27	0.26	Full service station	70%		
TOD 3-Caltrans/IHOP	127 W BURBANK BLVD	2460021028	Corridor Commercial	NSFC	27	0.13	Store	70%		
TOD 3-Caltrans/IHOP	CALTRANS PROPERTY	N/A	N/A		0	1.58	Vacant	70%		
Total						2.87		70%		23.0
TOD 4-Old IKEA	600 N SAN FERNANDO BLVD	2460023044	Downtown	PD	87	6.38	Reg. shopping	70%		
TOD 4-Old IKEA	731 N SAN FERNANDO BLVD	2460023045	Downtown	PD	87	0.90	Reg. shopping	70%		
TOD 4-Old IKEA	601 N SAN FERNANDO BLVD	2460023046	Downtown	PD	87	2.81	Reg. shopping	70%		
TOD 4-Old IKEA	600 N 1ST ST	2460023047	Downtown	PD	87	0.29	Reg. shopping	70%		
TOD 4-Old IKEA	230 E BURBANK BLVD	2460023060	Downtown	PD	87	1.67	Reg. shopping	70%		
TOD 4-Old IKEA	217 GRINNELL DR	2460031007	Downtown	BCC-2	87	0.19	Parking lot/patron	70%		
TOD 4-Old IKEA	215 GRINNELL DR	2460031008	Downtown	BCC-2	87	0.19	Parking lot/patron	70%		

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Prop SP Max Density	Realistic SP Net DUs
TOD 4-Old IKEA	218 E BURBANK BLVD	2460031016	Downtown	BCC-2	87	0.17	Parking lot/patron	70%		
TOD 4-Old IKEA	212 E BURBANK BLVD	2460031018	Downtown	BCC-2	87	0.19	Parking lot/patron	70%		
TOD 4-Old IKEA	800 N SAN FERNANDO BLVD	2460031019	Downtown	BCC-2	87	0.24	Bank/savings	70%		
TOD 4-Old IKEA	840 N SAN FERNANDO BLVD	2460031029	Downtown	BCC-2	87	0.16	Bank/savings	70%		
TOD 4-Old IKEA		2460031044	Downtown	BCC-2	87	0.16	Vacant	70%		
TOD 4-Old IKEA	800 N SAN FERNANDO BLVD	2460031045	Downtown	BCC-2	87	0.44	Fast food-walkup	70%		
Total						13.80		70%		839.0
TOD 5-Ashley Home/El Pollo	401 N 1ST ST	2460023056	Downtown	PD	87	2.06	Reg. shopping	70%		
TOD 5-Ashley Home/El Pollo	521 N 1ST ST	2460023057	Downtown	PD	87	0.65	Reg. shopping	70%		
Total						2.71		70%		164.0
TOD 6-Burbank Town Ctr	245 E MAGNOLIA BLVD	2460023048	Downtown	PD	87	1.31	Reg. shopping	70%		
TOD 6-Burbank Town Ctr	201 E MAGNOLIA BLVD	2460023049	Downtown	PD	87	5.20	Reg. shopping	70%		
TOD 6-Burbank Town Ctr	111 E MAGNOLIA BLVD	2460023050	Downtown	PD	87	1.41	Reg. shopping	70%		
TOD 6-Burbank Town Ctr	501 N 3RD ST	2460023052	Downtown	PD	87	2.23	Reg. shopping	70%		
TOD 6-Burbank Town Ctr	550 N 1ST ST	2460023054	Downtown	PD	87	2.71	Reg. shopping	70%		
TOD 6-Burbank Town Ctr	200 E CYPRESS AVE	2460023063	Downtown	PD	87	2.35	Reg. shopping	70%		
TOD 6-Burbank Town Ctr	(PRIV STREET AND YARD IMPS)	2460023064	Downtown	PD	87	1.26	Private Street	70%		
TOD 6-Burbank Town Ctr	555 N 3RD ST	2460023996	Downtown	PD	87	0.27	Theater	70%		
Total						16.75		70%		1020.0
TOD 7-Civic Center		2453008900	Institutional	PD	0	0.08	Parking lot lease	70%	87	4.9
TOD 7-Civic Center		2453008903	Institutional	PD	0	0.89	Gov't owned	70%	87	54.2
TOD 7-Civic Center	348 E ORANGE GROVE AVE	2453008905	Institutional	PD	0	0.36	Store/resid combo	70%	87	21.7
TOD 7-Civic Center	301 E OLIVE AVE	2453008908	Institutional	PD	0	0.53	Bank/savings	70%	87	32.5
TOD 7-Civic Center	375 E OLIVE AVE	2453008910	Institutional	PD	0	0.17	Parking lot/patron	70%	87	10.2
TOD 7-Civic Center		2453008911	Institutional	PD	0	0.20	Parking lot/patron	70%	87	12.2
TOD 7-Civic Center	374 E ORANGE GROVE AVE	2453008912	Institutional	PD	0	0.66	Bank/savings	70%	87	39.2
TOD 7-Civic Center (City Hall)	275 E OLIVE AVE	2453009902	Institutional	PD	0	1.79	City Hall/Admin Ctr	70%	87	109.2
TOD 7-Civic Center	110 N GLENOAKS BLVD	2455021906	Institutional	R-4	0	1.56	Central Library	70%	87	95.1
Total						6.24		70%	87	379.0

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Prop SP Max Density	Realistic SP Net DUs
TOD 8-Olive/Glenoaks	121 S GLENOAKS BLVD	2453014002	Downtown	BCC-3	87	0.08	Prof building	70%		
TOD 8-Olive/Glenoaks	123 S GLENOAKS BLVD	2453014003	Downtown	BCC-3	87	0.04	Store/resid combo	70%		
TOD 8-Olive/Glenoaks	147 S GLENOAKS BLVD	2453014008	Downtown	BCC-3	87	0.09	Store	70%		
TOD 8-Olive/Glenoaks	356 E OLIVE AVE	2453014012	Downtown	BCC-2	87	0.18	Prof building	70%		
TOD 8-Olive/Glenoaks	348 E OLIVE AVE	2453014014	Downtown	BCC-2	87	0.18	Office building	70%		
TOD 8-Olive/Glenoaks	362 E OLIVE AVE	2453014022	Downtown	BCC-2	87	0.06	Store	70%		
TOD 8-Olive/Glenoaks	358 E OLIVE AVE	2453014023	Downtown	BCC-2	87	0.12	Office building	70%		
TOD 8-Olive/Glenoaks	137 S GLENOAKS BLVD	2453014024	Downtown	BCC-3	87	0.16	Restaurant	70%		
TOD 8-Olive/Glenoaks	372 E OLIVE AVE	2453014025	Downtown	BCC-3	87	0.13	Bank/savings	70%		
TOD 8-Olive/Glenoaks	359 E ANGELENO AVE	2453014026	Downtown	BCC-2	87	0.17	Parking lot/patron	70%		
TOD 8-Olive/Glenoaks	353 E ANGELENO AVE	2453014029	Downtown	BCC-2	87	0.35	Office building	70%		
Total						1.55		70%		88.0
TOD 9-Fosters Freeze/Salvation Army	249 S GLENOAKS BLVD	2453021026	Downtown	BCC-3	87	0.19	Auto serv/body	70%	87	11.8
TOD 9-Fosters Freeze/Salvation Army	249 S GLENOAKS BLVD	2453021027	Downtown	BCC-3	87	0.09	Auto serv/body	70%	87	5.3
TOD 9-Fosters Freeze/Salvation Army	201 S GLENOAKS BLVD	2453021029	Downtown	BCC-3	87	0.25	Restaurant	70%	87	15.4
TOD 9-Fosters Freeze/Salvation Army	221 S GLENOAKS BLVD	2453021030	Downtown	BCC-3	87	0.21	Store	70%	87	12.5
TOD 9-Fosters Freeze/Salvation Army	354 E ANGELENO AVE	2453021032	High Density Residential	BCC-2	43	0.17	Prof building	70%	87	10.6
TOD 9-Fosters Freeze/Salvation Army	344 E ANGELENO AVE	2453021033	High Density Residential	BCC-2	43	0.17	Prof building	70%	87	10.6
TOD 9-Fosters Freeze/Salvation Army	336 E ANGELENO AVE	2453021035	High Density Residential	BCC-2	43	0.18	Private school	70%	87	10.7
TOD 9-Fosters Freeze/Salvation Army	320 E ANGELENO AVE	2453021041	High Density Residential	BCC-2	43	0.17	Church	70%	87	10.5
TOD 9-Fosters Freeze/Salvation Army	310 E ANGELENO AVE	2453021046	High Density Residential	BCC-2	43	0.35	Parking lot/patron	70%	87	21.4
TOD 9-Fosters Freeze/Salvation Army	300 E ANGELENO AVE	2453021062	High Density Residential	BCC-2	43	0.15	Church	70%	87	9.4
Total						1.94		70%	87	118.0
TOD-10-BJs/Black Angus	101 S 1ST ST, 400	2453011029	Downtown	BCC-2	87	2.12	Office building	70%		
TOD-10-BJs/Black Angus	235 S 1ST ST	2453018017	Downtown	BCC-2	87	1.71	Restaurant	70%		

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Prop SP Max Density	Realistic SP Net DUs
Total						3.83		70%		232.0
TOD 11-Victory/Olive	120 S VICTORY BLVD	2451016011	North Victory	BCCM	27	2.14	Office building	70%		
TOD 11-Victory/Olive	272 E OLIVE AVE	2451016012	North Victory	BCCM	27	0.24	Auto serv/body	70%		
TOD 11-Victory/Olive	264 W OLIVE AVE	2451016013	North Victory	BCCM	27	0.19	Auto serv/body	70%		
TOD 11-Victory/Olive	110 S VICTORY BLVD	2451016014	North Victory	BCCM	27	0.31	Auto serv/body	70%		
Total						2.90		70%		50.0
TOD 12-YMCA	353 E SAN JOSE AVE	2460034021	Downtown	BCC-2	87	0.35	Private school	70%		48.6
TOD 12-YMCA	409 N GLENOAKS BLVD	2460035001	Downtown	BCC-3	87	0.11	Parking lot/patron	70%		15.1
TOD 12-YMCA	369 E MAGNOLIA BLVD	2460035003	Downtown	BCC-3	87	0.18	Restaurant	70%		24.9
TOD 12-YMCA	361 E MAGNOLIA BLVD	2460035005	Downtown	BCC-2	87	0.17	Office building	70%		24.1
TOD 12-YMCA	353 E MAGNOLIA BLVD	2460035007	Downtown	BCC-2	87	0.17	Store/resid combo	70%		24.6
TOD 12-YMCA	352 E SAN JOSE AVE	2460035008	Downtown	BCC-2	87	0.18	Parking lot/patron	70%		24.9
TOD 12-YMCA	320 E SAN JOSE AVE	2460035014	Downtown	PD	87	0.28	Parking lot/patron	70%		39.5
TOD 12-YMCA	300 E SAN JOSE AVE	2460035016	Downtown	PD	87	0.33	Parking lot/patron	70%		46.7
TOD 12-YMCA	344 E SAN JOSE AVE	2460035017	Downtown	PD	87	0.36	Private school	70%		50.6
TOD 12-YMCA	321 E MAGNOLIA BLVD	2460035018	Downtown	PD	87	0.53	Club/Lodge Hall	70%		74.8
Total						2.66		70%		372.0
GOLDEN STATE SPECIFIC PLAN SITES										
GSSP-1 Lima/Avon	3075 N LIMA ST	2466001015	Golden State	M-2	27	0.16	Light industrial	70%	120	13.2
GSSP-1 Lima/Avon	3079 N LIMA ST	2466001016	Golden State	M-2	27	0.16	Light industrial	70%	120	13.1
GSSP-1 Lima/Avon	3310 COHASSET ST	2466001022	Golden State	M-2	27	0.15	Light industrial	70%	120	12.8
GSSP-1 Lima/Avon	3094 N AVON ST	2466001023	Golden State	M-2	27	0.15	Light industrial	70%	120	13.0
GSSP-1 Lima/Avon	3090 N AVON ST	2466001024	Golden State	M-2	27	0.15	Light industrial	70%	120	12.9
GSSP-1 Lima/Avon	3086 N AVON ST	2466001025	Golden State	M-2	27	0.31	Light industrial	70%	120	24.7
GSSP-1 Lima/Avon	3080 N AVON ST	2466001026	Golden State	M-2	27	0.18	Light industrial	70%	120	15.0
GSSP-1 Lima/Avon	3071 N LIMA ST	2466001029	Golden State	M-2	27	0.15	Light industrial	70%	120	12.6
GSSP-1 Lima/Avon	3083 N LIMA ST	2466001030	Golden State	M-2	27	0.31	Warehouse, storage	70%	120	26.0
GSSP-1 Lima/Avon	3059 N CALIFORNIA ST	2466001045	Golden State	M-2	27	0.15	Vacant	70%	120	12.5
GSSP-1 Lima/Avon	3063 N CALIFORNIA ST	2466001046	Golden State	M-2	27	0.16	Vacant	70%	120	13.6
GSSP-1 Lima/Avon	3300 N SAN FERNANDO BLVD	2466001063	Golden State	M-2	27	0.51	Warehouse, storage	70%	120	42.9

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Prop SP Max Density	Realistic SP Net DUs
GSSP-1 Lima/Avon	3089 N LIMA ST	2466001064	Golden State	M-2	27	0.16	Warehouse, storage	70%	120	13.1
GSSP-1 Lima/Avon	3099 N LIMA ST	2466001077	Golden State	M-2	27	0.31	Light industrial	70%	120	26.4
GSSP-1 Lima/Avon	3320 N SAN FERNANDO BLVD	2466001081	Golden State	M-2	27	0.99	Light industrial	70%	120	83.0
Total						4.00		70%		334.0
GSSP-2 N. Hollywood Way	3333 N SAN FERNANDO BLVD	2466005003	Golden State	M-2	27	0.89	Light industrial	80%	120	85.1
GSSP-2 N. Hollywood Way	3207 N SAN FERNANDO BLVD	2466005013	Golden State	M-2	27	0.50	Light industrial	80%	120	48.3
GSSP-2 N. Hollywood Way		2466005017	Golden State	M-2	27	0.20	Parking lot/structure	80%	120	19.0
GSSP-2 N. Hollywood Way		2466005018	Golden State	M-2	27	0.23	Parking lot/structure	80%	120	22.0
GSSP-2 N. Hollywood Way	3303 N SAN FERNANDO BLVD	2466005024	Golden State	M-2	27	1.33	Light industrial	80%	120	127.4
GSSP-2 N. Hollywood Way	3301 N SAN FERNANDO BLVD	2466005025	Golden State	M-2	27	1.26	Light industrial	80%	120	121.1
GSSP-2 N. Hollywood Way	3024 N HOLLYWOOD WAY	2466006002	Golden State	M-2	27	0.07	Light industrial	80%	120	5.3
GSSP-2 N. Hollywood Way	3022 N HOLLYWOOD WAY	2466006003	Golden State	M-2	27	0.06	Light industrial	80%	120	6.1
GSSP-2 N. Hollywood Way	3020 N HOLLYWOOD WAY	2466006004	Golden State	M-2	27	0.06	Light industrial	80%	120	5.9
GSSP-2 N. Hollywood Way	3018 N HOLLYWOOD WAY	2466006005	Golden State	M-2	27	0.07	Light industrial	80%	120	6.2
GSSP-2 N. Hollywood Way	3016 N HOLLYWOOD WAY	2466006006	Golden State	M-2	27	0.06	Light industrial	80%	120	6.1
GSSP-2 N. Hollywood Way	3014 N HOLLYWOOD WAY	2466006007	Golden State	M-2	27	0.06	Light industrial	80%	120	6.1
GSSP-2 N. Hollywood Way	3012 N HOLLYWOOD WAY	2466006008	Golden State	M-2	27	0.06	Light industrial	80%	120	6.0
GSSP-2 N. Hollywood Way		2466006009	Golden State	M-2	27	0.06	Parking lot/structure	80%	120	6.1
GSSP-2 N. Hollywood Way		2466006010	Golden State	M-2	27	0.06	Parking lot/structure	80%	120	6.1
GSSP-2 N. Hollywood Way	3000 N HOLLYWOOD WAY	2466006011	Golden State	M-2	27	0.30	Warehouse, storage	80%	120	28.8
Total						5.28		80%		505.0
GSSP-3 Valhalla	2210 N SCREENLAND DR	2463001005	Golden State	M-1	27	3.04	Light industrial	70%	120	255.5
GSSP-3 Valhalla	2211 N HOLLYWOOD WAY	2463001006	Golden State	M-1	27	0.34	Light industrial	70%	120	28.7
GSSP-3 Valhalla	2205 N HOLLYWOOD WAY	2463001007	Golden State	M-1	27	0.34	Light industrial	70%	120	27.3
GSSP-3 Valhalla	2201 N HOLLYWOOD WAY	2463001008	Golden State	M-1	27	0.34	Light industrial	70%	120	27.3
GSSP-3 Valhalla	3520 W VALHALLA DR	2463001011	Golden State	M-1	27	2.41	Light industrial	70%	120	202.3
GSSP-3 Valhalla	2231 N HOLLYWOOD WAY	2463001012	Golden State	M-1	27	1.64	Light industrial	70%	120	137.4
Total						8.10		70%		678.0

OP Site ID	Address	APN	General Plan	Zone	Current GP Max Density	Gross Acres	Current Use	Realistic Dev Potential %	Prop SP Max Density	Realistic SP Net DUs
GSSP-4 Logix	2340 N HOLLYWOOD WAY	2463010001	Golden State	M-2	27	4.46	Office building	80%	120	428.0
GSSP-5 Ontario		2464004036	Regional Commercial	PD	58	1.73	Parking lot/structure	80%	120	166.0
GSSP-6 Fairview		2464006045	Regional Commercial	M-2	58	0.65	Parking lot/structure	80%	58	30.0
GSSP-7 Empire	3030 W EMPIRE AVE	2464001002	Regional Commercial	M-2	58	0.39	Light industrial	80%	100	31.5
GSSP-7 Empire	3020 W EMPIRE AVE	2464001003	Regional Commercial	M-2	58	0.41	Light industrial	80%	100	32.5
GSSP-7 Empire	2820 W EMPIRE AVE	2464001007	Regional Commercial	M-2	58	0.74	Heavy industrial	80%	100	59.2
GSSP-7 Empire	3110 W EMPIRE AVE	2464001015	Regional Commercial	M-2	58	0.82	Office building	80%	100	65.9
GSSP-7 Empire	3000 W EMPIRE AVE	2464001019	Regional Commercial	M-2	58	1.98	Light industrial	80%	100	158.0
GSSP-7 Empire	2890 W EMPIRE AVE	2464001020	Regional Commercial	M-2	58	0.86	Light industrial	80%	100	68.9
GSSP-7 Empire	3120 W EMPIRE AVE	2464001021	Regional Commercial	M-2	58	1.13	Warehouse, storage	80%	100	89.3
GSSP-7 Empire		2464001906	Institutional	RR	0	0.06	Government, public	80%	100	4.9
Total						6.40		80%		510.0
TOTAL PROPOSED SPECIFIC PLAN OPPORTUNITY SITES						93.7				6,066 units

Exhibit D-1

TOD and GSSP Opportunity Sites

TOD 1 - Carl's Jr.



Site Acreage: 1.29 acres

Current General Plan Land Use:
High Density Res. (43 du/ac)
Corridor Commercial (27 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (27 du/ac and 43 du/ac)

Net Unit Potential: 26 units

Programs to Facilitate Development: 5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

This site is located at prominent corner across the street from McCambridge Park on San Fernando Road. The site abuts multifamily and is in a TCAC designated highest resource area with underutilized service commercial/fast food restaurants whose buildings are more than 40 years old, and an improvement-to-land value ratio of just 0.75.¹ Five of the seven parcels are owned by one owner. The properties are targeted as opportunity sites in the Downtown Burbank TOD Specific Plan and the City is engaging with the property owners about the viability of developing mixed use projects at both sites individually, or through consolidation into a larger parcel. In conjunction with release of the City's draft Housing Element opportunity sites and public meetings regarding the Downtown TOD Specific Plan update, the City has received inquiries as recently as October 2021 about the site's development potential that currently exists, as well as what is being envisioned through the TOD Specific Plan. The existing base maximum density is proposed to be increased as part of the Specific Plan update. Beyond that, other housing development incentives to be established with the Specific Plan update will further support the likelihood of residential development on the site. As noted in the inventory, the site is expected to yield fewer than 100 dwelling units and would therefore fall within the Housing Element program to allow for by-right ministerial review. Additional factors supporting residential development include density incentives for lot

¹ Improvement-to-land value ratios under 1.0 are considered economically conducive for redevelopment.

	<p>consolidation, reduced parking for residential use, and identification of the site as an opportunity site within the Specific Plan itself.</p> <p>In order for the level of projected housing development to occur on this opportunity site, small-lot consolidation will be necessary. This site has seven small parcels with three property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other TOD sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.</p> <p>The City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.</p>
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TOD 2 - Kmart Shopping Center



Site Acreage: 6.43 acres

General Plan Land Use:
Corridor Commercial (27 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (27 du/ac)

Net Unit Potential: 104 units

Programs to Facilitate Development:
5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

This opportunity site is located in a prime location along the North San Fernando Boulevard corridor and includes a now shuttered K-Mart store built in 1962 and large surface parking area under single-ownership. The area is identified as highest resource by TCAC, is in close proximity to services including the adjacent McCambridge Park, and within a high-quality transit area. The property is targeted as an opportunity site in the Downtown Burbank TOD Specific Plan and the City is engaging with the multiple prospective developers seeking to develop the site as a residential and/or mixed-use project. One of the two parcels on this site (southeastern portion) has an improvement-to-land value ratio of 0.80 and the existing building was also built in 1962. Furthermore, the existing base maximum density is proposed to be increased as part of the Specific Plan update to allow up to 43

dwelling units per acre. Beyond that, other housing development incentives to be established with the Specific Plan update will further support the likelihood of residential development on the site.

In February 2022, City staff met with the property owner's representative and architect about a potential mixed-use project at the subject site. The property owner's representatives conveyed their interest in being involved in the Downtown TOD Specific Plan process to provide input on a mixed-use project on the site that is consistent with the Specific Plan project objectives and with the Program Environmental Impact Report in order to preserve any future opportunities for streamlined project review and environmental assessment. Communications between staff and the property owner's representatives is ongoing.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

TOD 3 - Caltrans/IHOP



Site Acreage: 2.87 acres

General Plan Land Use:

Corridor Commercial (27 du/ac)

Proposed Zoning:

Downtown Burbank TOD SP (27 du/ac)

Net Unit Potential: 23 units

Programs to Facilitate Development:

5, 9, 10, 11, 17, 19, 20, 22

Note: 1.58-acre Caltrans property not included for residential development

Site Description and Factors Supporting Development:

This opportunity site includes a 1960s IHOP restaurant (closed), fast food restaurant, gas station and surface parking. The site also includes a 1.58-acre parcel of land owned by Caltrans. The prior use of the Caltrans property was an off-ramp from the I-5 freeway to Burbank Boulevard. As surplus property, it is currently used as a staging area for the construction of a bridge overpass; however, once the construction is completed, the City will engage with Caltrans to obtain the property. The first communication with Caltrans was in early 2022. While no specific environmental studies have not been conducted on the Caltrans property, all potential environmental risks will be assessed as part of the TOD Specific Plan Program EIR. The existing buildings are over 40 years and the property is underutilized. Excluding the Caltrans parcel, the site has an improvement-to-land value ratio of just 0.17, indicating a strong potential for lot consolidation and redevelopment with a higher value economic use. City staff will continue to engage with Caltrans and the adjacent property owners about the viability of

redeveloping these parcels as a cohesive mixed-use project including the introduction of affordable and market rate residential units in proximity to downtown. Redevelopment of the site is being evaluated as part of the Downtown Burbank TOD Specific Plan. This site falls within the Housing Element program to allow for by-right ministerial review process for projects within the specific plans that include 100 dwelling units or fewer.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has six small parcels (not counting the Caltrans parcel) with three property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other TOD sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

In addition, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

TOD 4 - Old IKEA Site



Site Acreage: 13.8 acres

General Plan Land Use:
Downtown (87 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP
(87 du/ac)

Net Unit Potential: 839 units

**Programs to Facilitate
Development:** 5, 9, 10, 11, 17, :

Site Description and Factors Supporting Development:

After the closing of the old IKEA building in 2017, the owners of the property (also owners of adjacent Burbank Town Center) proposed development of a seven-story mixed-use project on the 13.8-acre site that would have produced over 1,100 new housing units. The project was subsequently paused just prior to the COVID pandemic. City staff has been in ongoing discussions with the property owners, and have proposed by right approval of residential land uses, as well as consideration of the possible repurposing of vacant and/or underutilized portions of the mall square footage as office use. In the most recent discussion with the owners (October 2021) they requested to include the private street (Cypress Ave) that runs between N. 1st and N. 3rd Streets to the total site area in order to increase the potential for additional building area, including for a residential portion. These efforts are focused on facilitating a mixed-use project that combines potential for new office space with new housing in a major employment and transportation hub within the City's Downtown Burbank TOD Specific Plan. As of November 2021, the Onni Group (a Toronto-based investor and developer with expertise in the construction of mixed-use developments) has acquired the Burbank Town Center as well as approximately 75% of the land within the TOD 4

opportunity site for redevelopment purposes, and has been in discussions with City staff about the pending Downtown Burbank TOD Specific Plan as it relates the Town Center site. While they are still defining the scope of their project, their goal is to develop well in excess of the 1,020 units identified in the Housing Element for this site. In May of 2022, City staff met with the property owner's representatives and architects about a potential mixed-use project at the subject site. The property owner's representatives conveyed their interest in being involved in the Downtown TOD Specific Plan process to provide input on a mixed-use project on the subject site that is consistent with the Specific Plan project objectives and with the Program EIR to preserve any future opportunities for streamlined project review and environmental assessment. Communications between staff and the property owner's representatives is ongoing.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

TOD 5 – Ashley Home/El Pollo



Site Acreage: 2.71 acres

General Plan Land Use:
Downtown (87 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (87 du/ac)

Net Unit Potential: 164 units

Programs to Facilitate Development:
5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

This site is also owned by the property owner of the Burbank Town Center and old IKEA property. It is currently developed with an Ashley Furniture store and El Pollo Loco developed in the early 1990s. With a land-to-improvement value of just 0.74, it has high redevelopment potential. As previously discussed, City staff has been in ongoing discussions about redeveloping the site with Crown Realty Group, which own the land. As of November 2021, the Onni Group (a Toronto-based investor and developer with expertise in the construction of mixed-use developments) has purchased the Burbank Town Center for redevelopment purposes, and has been in discussions with City staff about the pending Downtown Burbank TOD Specific Plan as it relates the Town Center site. While they are still defining the scope of their project, their goal is to develop well in excess of the 1,020 units identified in the Housing Element for this site. In May of 2022, City staff met with the property owner's representatives and architects about a

	<p>potential mixed-use project at the subject site. The property owner’s representatives conveyed their interest in being involved in the Downtown TOD Specific Plan process to provide input on a mixed-use project of the subject site that is consistent with the Specific Plan project objectives and with the Program Environmental Impact Report in order to preserve any future opportunities for streamlined project review and environmental assessment. Communications between staff and the property owner’s representatives is ongoing.</p> <p>In addition, the City’s Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of this year and posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.</p>
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the Downtown TOD Specific Plan process to provide input on a mixed-use project of the subject site that is consistent with the Specific Plan project objectives and with the Program Environmental Impact Report to preserve any future opportunities for streamlined project review and environmental assessment. Communications between staff and the property owner's representatives is ongoing.

Furthermore, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

TOD 7 - Civic Center



Site Acreage: 6.24 acres

General Plan Land Use:
Institutional (0 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP
(87 du/ac)

Net Unit Potential: 379 units

**Programs to Facilitate
Development:** 5, 8, 9, 10, 11,
17, 19, 20, 22

Site Description and Factors Supporting Development:

The Civic Center site currently has no allowable residential density under the Institutional General Plan land use designation. As part of the Downtown TOD Specific Plan and Housing Element implementation, the site's density will be increased to allow up to 87 dwelling units per acre. This effort will help facilitate the planning and visioning process that the City is currently undertaking with the community and City decision makers to consider redevelopment of City-owned properties within this opportunity site to include a new library, affordable and workforce housing, new office space, shared parking facilities, a transit plaza, and new public open spaces; the existing City Hall building will remain. The site includes administrative buildings, bank, library, parking lot and a portion of a parking structure. As part of the development of the Downtown Burbank TOD Specific Plan, the City is developing a general concept for the Civic Center opportunity site that will consider the development of a Public-Private-Partnership ("P3") to help facilitate the development of the project during the 2021-2029 planning period. The proposed land uses, including residential, will be evaluated as part of the Specific Plan's Program EIR with the intent to facilitate streamlined review of future development. The Specific Plan will also consider the potential use of transfer development rights, to allow transfer of unused density to other parcels within the Civic Center site.

	<p>Over the past seven months, the City’s Civic Center taskforce made of key City executives and land development staff have been working with ARUP and a subconsultant team made up of economists, urban designers, traffic engineers, and environmental consultants to develop a plan to consider a public private partnership (“P3”) for the Civic Center. The Civic Center plan would include amongst other things, the development of housing, office, retail and a new library as well as on-site parking. During this period, the City has undertaken various studies including development of multiple Civic Center conceptual plans, parking analysis, capital cost estimate and affordability assessment. This effort will culminate in a presentation by City staff and ARUP to the City Council in the last quarter of 2022. It is the intent of this effort to seek City Council authorization to prepare an RFP to solicit proposals from qualified developers to build out the Civic Center in a manner that addresses the various mix of residential, commercial, and civic uses. The RFP development, solicitation of proposals and negotiation would take approximately 12 months to complete in late 2023. It is anticipated that a Civic Center Project would be underway by the summer of 2025.</p>
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TOD 8 - Olive and Glenoaks



Site Acreage: 1.55 acres

General Plan Land Use:
Downtown (87 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (87 du/ac)

Net Unit Potential: 88 units

Programs to Facilitate Development: 5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

City staff had previous discussions with the property owner about the redevelopment of this opportunity site as a residential/mixed use project. The site currently contains multi-tenant office buildings in the City's Downtown. The majority of the buildings on the site were constructed prior to 1980 and half of the parcels are underutilized with improvement to land value ratios of less than 1. The site includes 11 separate parcels and three owners. The site itself is near the City's downtown adjacent to a Los Angeles County Courthouse and across the street from the City's Civic Center. The site is approximately half a mile from the Downtown Burbank Metrolink Train Station, within a High Quality Transit Area. Per TCAC Opportunity Map, the site is within a high resource area. The redevelopment effort is focused on facilitating a mixed-use project that combines the potential for new office space with new housing in a major employment and transportation hub. In addition, this site falls within the Housing Element program to allow for by-right ministerial review process for projects within the specific plans that include 100 dwelling units or

fewer. Various property owners have approached City staff in the past regarding potential development of the site. Once the draft of the Downtown TOD Specific Plan is available for public review, City staff will reach out to the property owners of the opportunity site and invite them to participate in workshop to discuss the draft plan and solicit input from the public.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has 11 small parcels with three property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other TOD sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

In addition, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

TOD 9 - Fosters Freeze/Boys and Girls Club



Site Acreage: 1.94 acres

General Plan Land Use:

Downtown (87 du/ac)

High Density Residential (43 du/ac)

Proposed Zoning:

Downtown Burbank TOD SP (87 du/ac)

Net Unit Potential: 118 units

Programs to Facilitate Development:

5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

City staff had previous redevelopment discussions with the property owner of the north half of this opportunity site about the redevelopment of the opportunity site as a residential/mixed use project. The site currently contains medical office buildings, Foster Freeze Restaurant, a small church, and other older structures. The site's overall improvement-to-land value ratio is 0.46 and the majority of structures were built prior to 1980. The site is adjacent to a Los Angeles County Courthouse and the City's Civic Center, and is a little more than half a mile from the Downtown Burbank Metrolink Station. The portion of the site that has an existing General Plan Land Use designation of High Density Residential at 43 dwelling units per acre will be increased to allow for 87 dwelling units per acre. This increase in density accounts for approximately 1.37 acres of the total 1.94-acre site.

	<p>Similar to the previous site (TOD 8), various property owners have approached City staff in the past regarding potential development of the site. Once the draft of the Downtown TOD Specific Plan is available for public review, City staff will reach out to the property owners of the opportunity site and invite them to participate in workshop to discuss the draft plan and solicit input from the public.</p> <p>In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has ten small parcels with five property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other TOD sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.</p> <p>In addition, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.</p>
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TOD 10 - BJ's and Black Angus



Site Acreage: 3.83 acres

General Plan Land Use:
Downtown (87 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (87 du/ac)

Net Unit Potential: 232 units

Programs to Facilitate Development:
5, 9, 10, 11, 17, 19, 20, 22

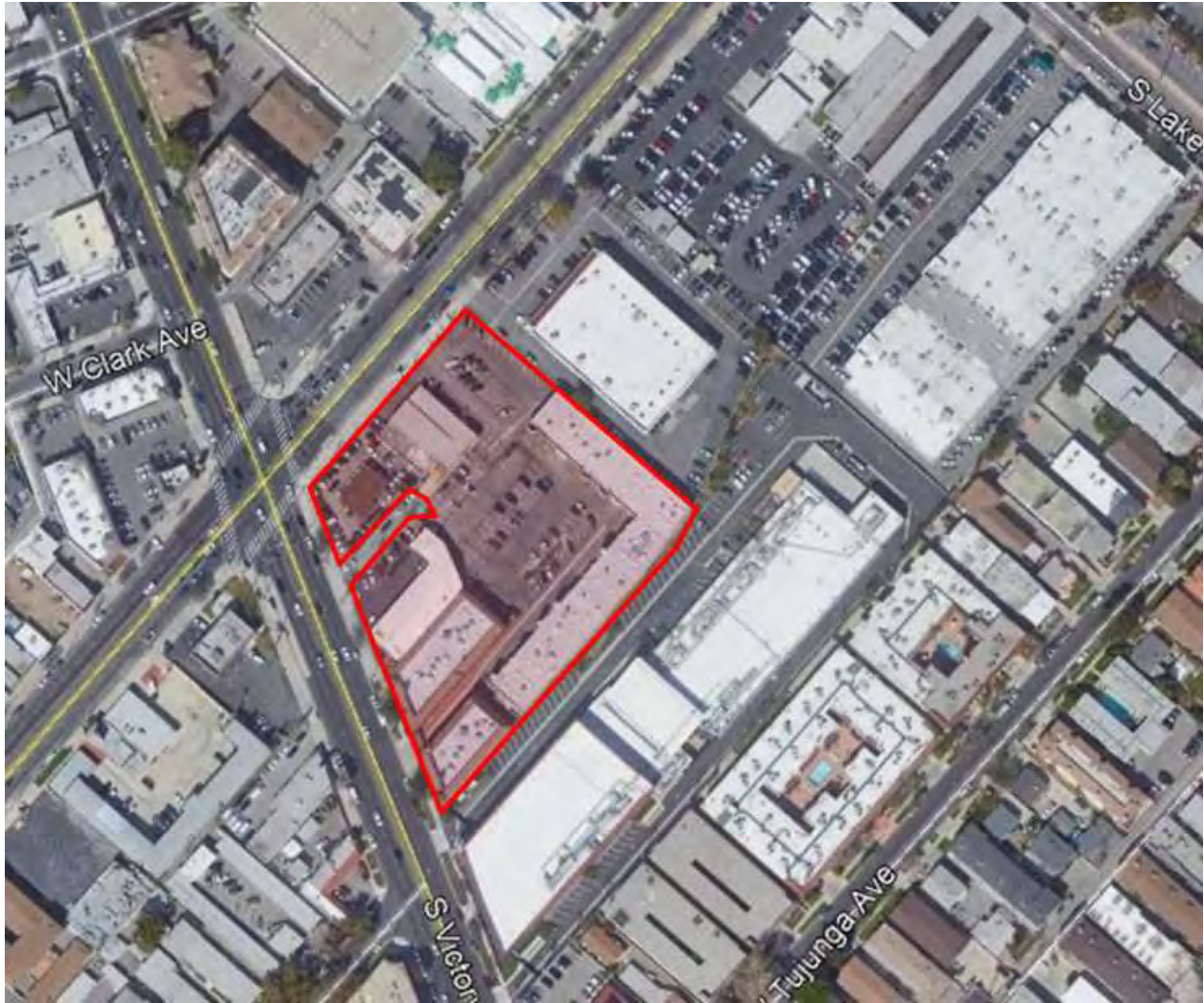
Site Description and Factors Supporting Development:

The opportunity site is located in a prime location within Downtown and includes two standalone restaurants (BJ's and Black Angus), and an office building. Approximately 75% of the underutilized 3.83-acre site is currently used for parking. The site is within easy walking distance (approximately half-mile) from the Downtown Burbank Metrolink Station. The City is engaging with multiple prospective developers seeking to develop the site as a residential and/or mixed-use development. The City has received inquiries during the current planning period about the short and long-term development potential of the site.

In addition, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc.

	<p>that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.</p>
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TOD 11 - Victory/Olive



Site Acreage: 2.9 acres

General Plan Land Use:
North Victory (27 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (27 du/ac)

Net Unit Potential: 50 units

Programs to Facilitate Development:
5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

This opportunity site is located at the corner of Victory Boulevard and Olive Avenue, west of the I-5 freeway. The site contains a collection of underutilized service commercial/media uses. The site's overall improvement-to-land value ratio is 0.86. The City is engaging with the property owners about the viability of developing mixed-use projects on individual parcels or on a consolidated site. The City has received inquiries during the current planning period about the short- and long-term development potential envisioned as a result of the proposed Specific Plan. This site falls within the Housing Element program to allow for by-right ministerial review process for projects within the specific plans that include 100 dwelling units or fewer. In January 2022, City staff met with the property owner's attorney and land development representative about a potential mixed-use project at the subject site. The property owner's representatives conveyed their interest in being involved in the Downtown TOD Specific Plan process to provide input on a mixed-use project of the subject site that is consistent with the Specific Plan project objectives and with

the Program EIR in order to preserve any future opportunities for streamlined project review and environmental assessment. Communications between staff and the property owners' representatives is ongoing.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has four small parcels with three property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other TOD sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

TOD 12 - YMCA



Site Acreage: 2.66 acres

General Plan Land Use:
Downtown (87 du/ac)

Proposed Zoning:
Downtown Burbank TOD SP (87 du/ac)

Net Unit Potential: 372 units

Programs to Facilitate Development:
5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

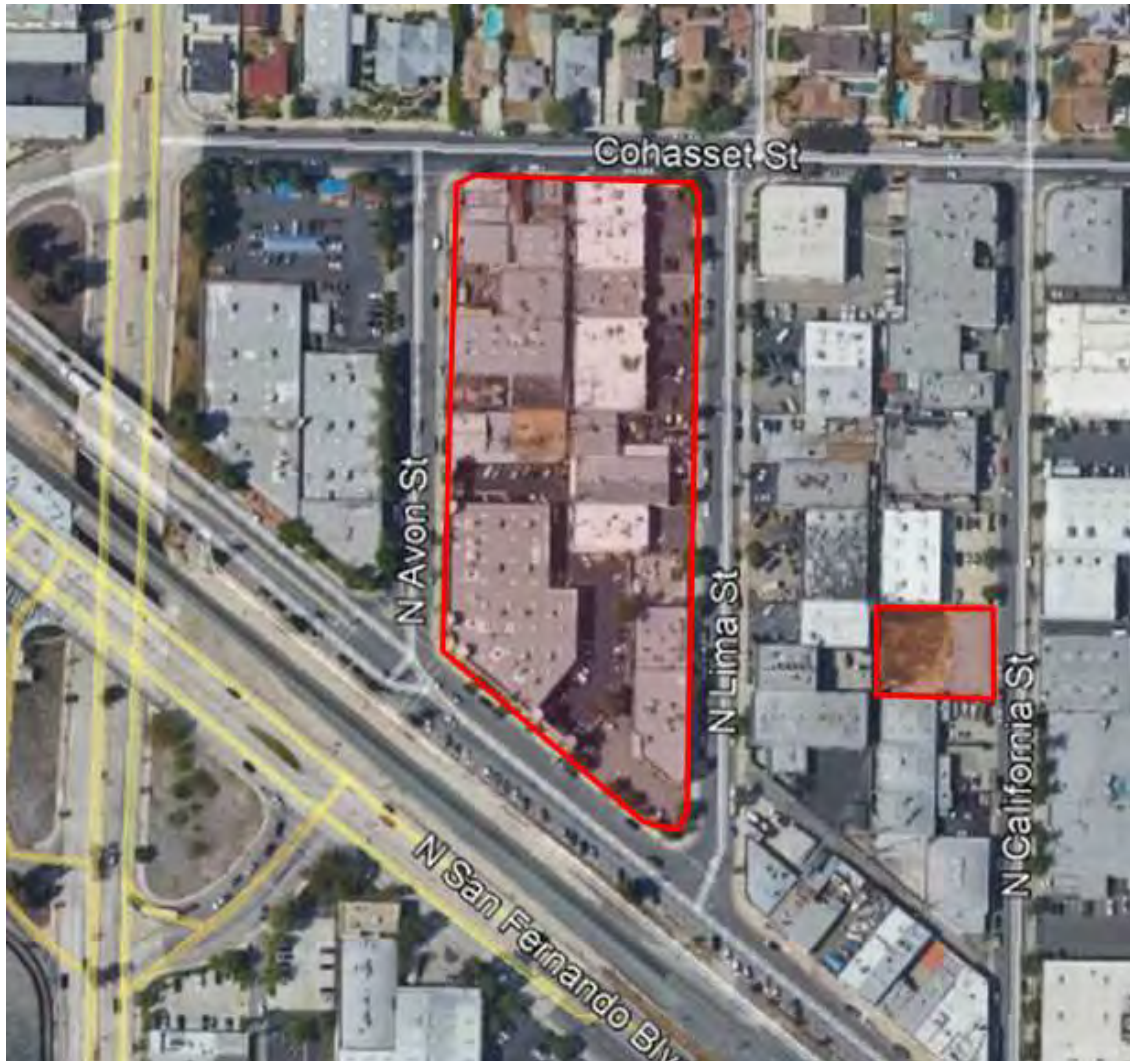
The 10 parcels that make up this opportunity site include the existing YMCA facility and adjacent retail/commercial businesses and surface parking on YMCA-owned properties. Most of the existing buildings were constructed prior to 1980 and most parcels are underutilized with improvement to land value ratios of less than 1.0. The YMCA-led property ownership group and development team initiated a pre-application meeting with City staff in February 2021 during which the conceptual project proposal was discussed. The redevelopment of the YMCA opportunity site would include a new YMCA facility along with associated community-serving retail and child development center, as well as market rate and affordable units through a combination of the City's inclusionary housing requirement and State density bonus incentive. The site is within 0.3 miles of the Civic Center, a prominent location within the transit and jobs-rich Downtown core and 0.8 miles from the Downtown Burbank Metrolink Train Station. Preliminary project proposal for the site facilitates development of 372 dwelling

units including 66 deed-restricted affordable lower income units. In April 2022, City staff met with the property owner’s attorney and land development representative about a potential mixed-use project at the subject site. The property owner’s representatives conveyed their interest in being involved in the Downtown TOD Specific Plan process to provide input on a mixed-use project of the subject site that is consistent with the Specific Plan project objectives and with the Program Environmental Impact Report to preserve any future opportunities for streamlined project review and environmental assessment. Communications between staff and the property owner’s representatives is ongoing.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has ten small parcels with four property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other TOD sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

Moreover, the City’s Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

GSSP 1 - Lima/Avon



Total Acres: 4.0 acres

General Plan Land Use:
Golden State (27 du/ac)

Proposed Zoning:
Golden State SP (120 du/ac)

Net Unit Potential: 334 units

Programs to Facilitate Development: 5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

This site encompasses 15 parcels within the City’s Golden State Specific Plan focus area. The properties are bounded by San Fernando Blvd, Avon Street, Lima Street and Cohasset Street. One vacant parcel is located on California Street. These parcels are currently zoned as General Industrial (M-2) and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 120 dwelling units per acre, to allow for mixed use residential development within a quarter mile of the existing Burbank Airport – North AV Line Metrolink Station, and a half mile of Hollywood Burbank Airport and proposed High Speed Rail Station. Additionally, these parcels are within close proximity of major regional employers including an Amazon Delivery Station, Nickelodeon, Cartoon Network, Netflix, Hasbro, Warner Brothers and Disney. The site includes uses such as storage and warehousing, light industrial and parking lots, with a majority of the buildings built prior to 1980 and half of the parcels are underutilized with improvement to land value ratios of less than 1.0. Representatives of property owners and potential investors have expressed interest in multi-family residential development within this site.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has 15 small parcels with 11 property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other GSSP sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

GSSP 2 - N. Hollywood Way



Site Acreage: 5.28 acres

General Plan Land Use:
Golden State (27 du/ac)

Proposed Zoning:
Golden State SP (120 du/ac)

Net Unit Potential: 505 units

Programs to Facilitate Development:
5, 9, 10, 11, 17, 19, 20, 22

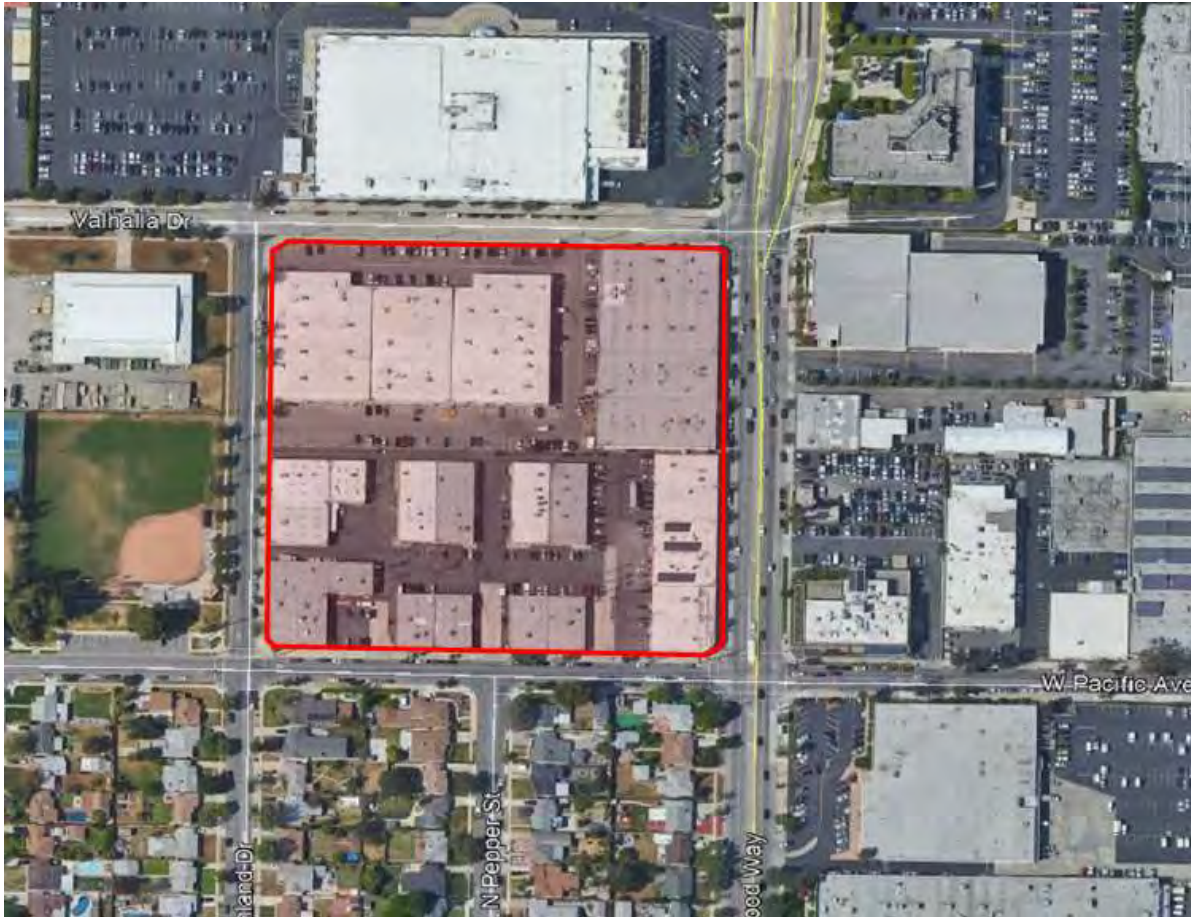
Site Description and Factors Supporting Development:

This site encompasses 16 parcels near the southeast corner San Fernando Blvd and Hollywood Way. These parcels are currently zoned as General Industrial (M-2) and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 120 dwelling units per acre, to allow for mixed use residential development within a quarter mile of the existing Burbank Airport – North AV Line Metrolink Station, and a half mile of Hollywood Burbank Airport and proposed High Speed Rail Station. Additionally, these parcels are within close proximity of major regional employers including an Amazon Delivery Station, Nickelodeon, Cartoon Network, Netflix, Hasbro, Warner Brothers and Disney. The sites currently include uses such as storage and warehousing, light industrial and parking lots. The majority of the building are over 40 years old and most of the parcels have an improvement to land value of less than 1.0. Representatives of property owners and potential investors have expressed interest in multi-family residential developments in this opportunity site. A majority of these parcels have improvement-to-land value ratios of less than 1.0 and buildings constructed prior to 1980.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has 16 small parcels and 12 owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other GSSP sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

GSSP 3 - Valhalla



Site Acreage: 8.10 acres

General Plan Land Use:
Golden State (27 du/ac)

Proposed Zoning:
Golden State SP (120 du/ac)

Net Unit Potential: 678 units

Programs to Facilitate Development: 5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

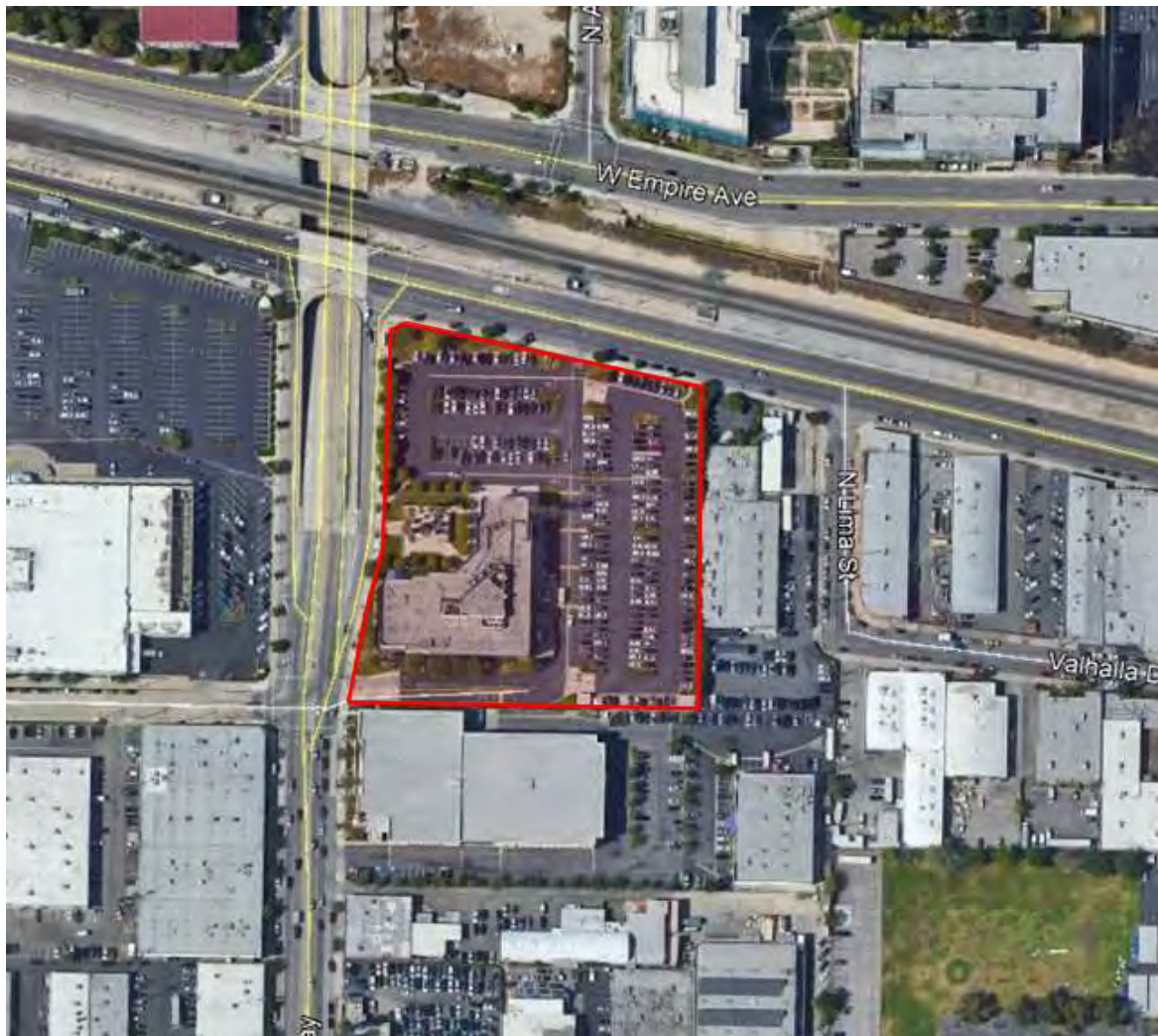
This site encompasses six parcels bounded by Screenland Drive, Pacific Avenue, Valhalla Drive and Hollywood Way. These parcels are currently zoned as Limited Industrial (M-1) and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 120 dwelling units per acre, to allow for mixed use residential development within a quarter mile of the existing Burbank Airport – South VC Line Metrolink Station, and approximately a half mile of Hollywood Burbank Airport and the proposed High Speed Rail Station. Additionally, these parcels are within close proximity of major regional employers including an Amazon Delivery Station, Nickelodeon, Cartoon Network, Netflix, Hasbro, Warner Brothers and Disney. The sites currently include uses such as storage and warehousing, light industrial and parking lots. A majority of these parcels have improvement-to-land value ratios of less than 1.0 and buildings constructed prior to 1980. With the rezoning, these properties would be key candidates for residential development, similar the development of the former Fry’s Property by La Terra Development, LL, which proposes over 800 residential units. Redevelopment of these six parcels would bridge the gap between the existing residential neighborhood to the south of Pacific Avenue and the proposed residential development north of Valhalla Drive.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has six small parcels with five property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five projects took advantage of density bonuses and provided affordable units. Other GSSP sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

This opportunity site is just south of the property at 2311 N. Hollywood Way (a former Frys Electronics Store) that is being developed with a 862 unit mixed-use project. The Frys site is adjacent to the Airport Influence Area and railroad right of way. The approved project includes numerous project design features and mitigation measures to address noise control measures and façade upgrades such as MERV 13 filtration system, sound baffling glass barriers, and interior design of units to maintain interior unit noise to 45 dBA, to name a few. The project’s design features and mitigation measures are consistent with the City’s Burbank2035 General Plan goals and policies that seek to facilitate mixed use projects near public transit and employment centers while ensuring that new residential development located near the airport, railroad, and freeways are designed to address any potential health risks in compliance with City green building codes, the City’s Greenhouse Gas Reduction Plan, and Burbank2035 Land Use, Housing, Air Quality/Greenhouse Gas, and Mobility Elements. The subject GSSP 3 site is located south of the Frys development site, and thus will benefit from buffering by the new development’s high rise construction and location away from the airport noise influence area and railroad right of way. Any future development at GSSP 3 would be required to receive similar clearances to the Frys site from the FAA and the Airport Land Use Committee before obtaining approval from the City for development.

Moreover, the City’s Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

GSSP 4 - Logix



Site Acreage: 4.46 acres

General Plan Land Use:
Golden State (27 du/ac)

Proposed Zoning:
Golden State SP (120 du/ac)

Net Unit Potential: 428 units

Programs to Facilitate Development: 5, 9, 10, 11, 17, 19, 22

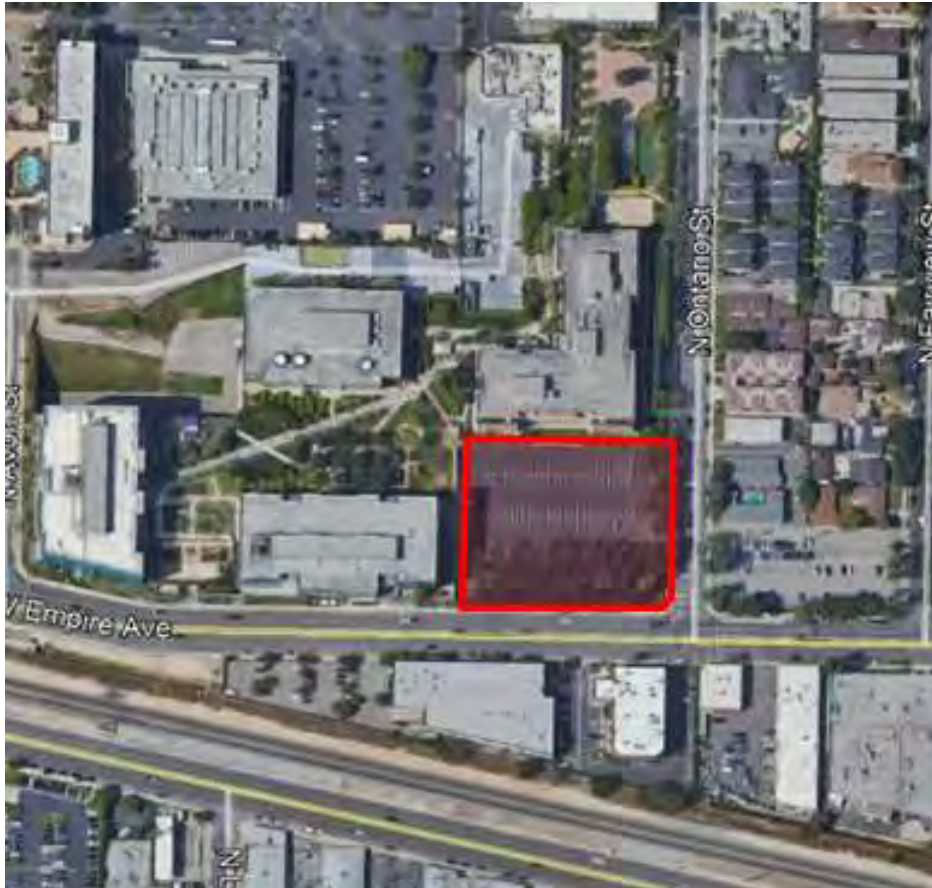
Site Description and Factors Supporting Development:

This one-parcel site is located at the southeast corner of Vanowen Street and Hollywood Way. This parcel is currently zoned as General Industrial (M-2) and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 120 dwelling units per acre, to allow for mixed use residential development within a quarter mile of the existing Burbank Airport – South VC Line Metrolink Station, and approximately a half mile of Hollywood Burbank Airport and the proposed High Speed Rail Station. This site is within close proximity of major regional employers including an Amazon Delivery Station, Nickelodeon, Cartoon Network, Netflix, Hasbro, Warner Brothers and Disney. The site is currently improved with a pre-1980 office building and surrounding surface parking. In 2016, Logix Federal Credit Union – the tenant occupying the existing office building – announced that they would be relocating their company headquarters from Burbank to Valencia CA. In 2020 the City met with a potential investor (La Terra Development, LLC) who expressed interest in multi-family residential developments on this opportunity site. This opportunity site is east of the property at 2311 N. Hollywood Way (a former Frys Electronics Store) that is being developed

with a 862 unit mixed-use project. The Frys site is adjacent to the Airport Influence Area and railroad right of way. The approved project includes numerous project design features and mitigation measures to address noise control measures and façade upgrades such as MERV 13 filtration system, sound baffling glass barriers, and interior design of units to maintain interior unit noise to 45 dBA, to name a few. The project’s design features and mitigation measures are consistent with the City’s Burbank2035 General Plan goals and policies that seek to facilitate mixed use projects near public transit and employment centers while ensuring that new residential development located near the airport, railroad, and freeways are designed to address any potential health risks in compliance with City green building codes, the City’s Greenhouse Gas Reduction Plan, and Burbank2035 Land Use, Housing, Air Quality/Greenhouse Gas, and Mobility Elements. The subject GSSP 4 site is located further east of the Frys development site, which will be buffered by the new development’s construction and further away from the airport noise influence area. Any future development at GSSP 4 would have to receive similar clearances to the 2311 N. Hollywood Way development site from the FAA and the Airport Land Use Committee before obtaining approval from the City for development.

Moreover, the City’s Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City’s website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

GSSP 5 - Ontario



Site Acreage: 1.73 acres

General Plan Land Use:
Regional Commercial (58 du/ac)

Proposed Zoning:
Golden State SP (120 du/ac)

Net Unit Potential: 166 units

Programs to Facilitate Development: 5, 9, 10, 11, 17, 19, 22

Site Description and Factors Supporting Development:

This site includes one parcel located at the northeast corner of Empire Avenue and Ontario Street. This parcel is currently zoned as Planned Development and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 120 dwelling units per acre, to allow for mixed use residential development within a quarter mile of the existing Burbank Airport – South VC Line Metrolink Station, and approximately a half mile of Hollywood Burbank Airport and the proposed High Speed Rail Station. This site is within close proximity of major regional employers. The site is currently improved with a surface parking lot. City staff has been in ongoing discussions the property owner, Worthe Realty Group who has shown an interest in redeveloping the site with a mixed use and/or residential project pursuant to the proposed Golden State Specific Plan which seeks to maximize housing opportunities within a half-mile distance of the existing Burbank Airport Metrolink Station. The site is within a major employment complex (The Media Studios North Campus), which houses businesses like Disney, Hasbro, Madison Square Garden entertainment and Kaiser Permanente. The purpose is to maximize the proximity of the site to major employment, improve housing availability in the neighborhood, and reduce vehicle miles travelled for existing and future employees of the Media Studio North Campus and surrounding employers. This parcel has an improvement-to-land value ratio of just 0.03.

This opportunity site is northeast of the property at 2311 N. Hollywood Way (a former Fry's Electronics Store) that is being developed with a 862 unit mixed-use project. The Fry's site is adjacent to the Airport Influence Area and railroad right of way. The approved project includes numerous project design features and mitigation measures to address noise control measures and façade upgrades such as MERV 13 filtration system, sound baffling glass barriers, and interior design of units to maintain interior unit noise to 45 dBA, to name a few. The project's design features and mitigation measures are consistent with the City's Burbank2035 General Plan goals and policies that seek to facilitate mixed use projects near public transit and employment centers while ensuring that new residential development located near the airport, railroad, and freeways are designed to address any potential health risks in compliance with City green building codes, the City's Greenhouse Gas Reduction Plan, and Burbank2035 Land Use, Housing, Air Quality/Greenhouse Gas, and Mobility Elements. The subject GSSP 5 site is located further east of the Fry's development site, which will be buffered by the new development's construction and further away from the airport noise influence area. Any future development at GSSP 5 would have to receive similar clearances to the 2311 N. Hollywood Way development site from the FAA and the Airport Land Use Committee before obtaining approval from the City for development.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

GSSP 6 - Fairview



Site Acreage: 0.65 acres

General Plan Land Use:
Regional Commercial (58 du/ac)

Proposed Zoning:
Golden State SP (58 du/ac)

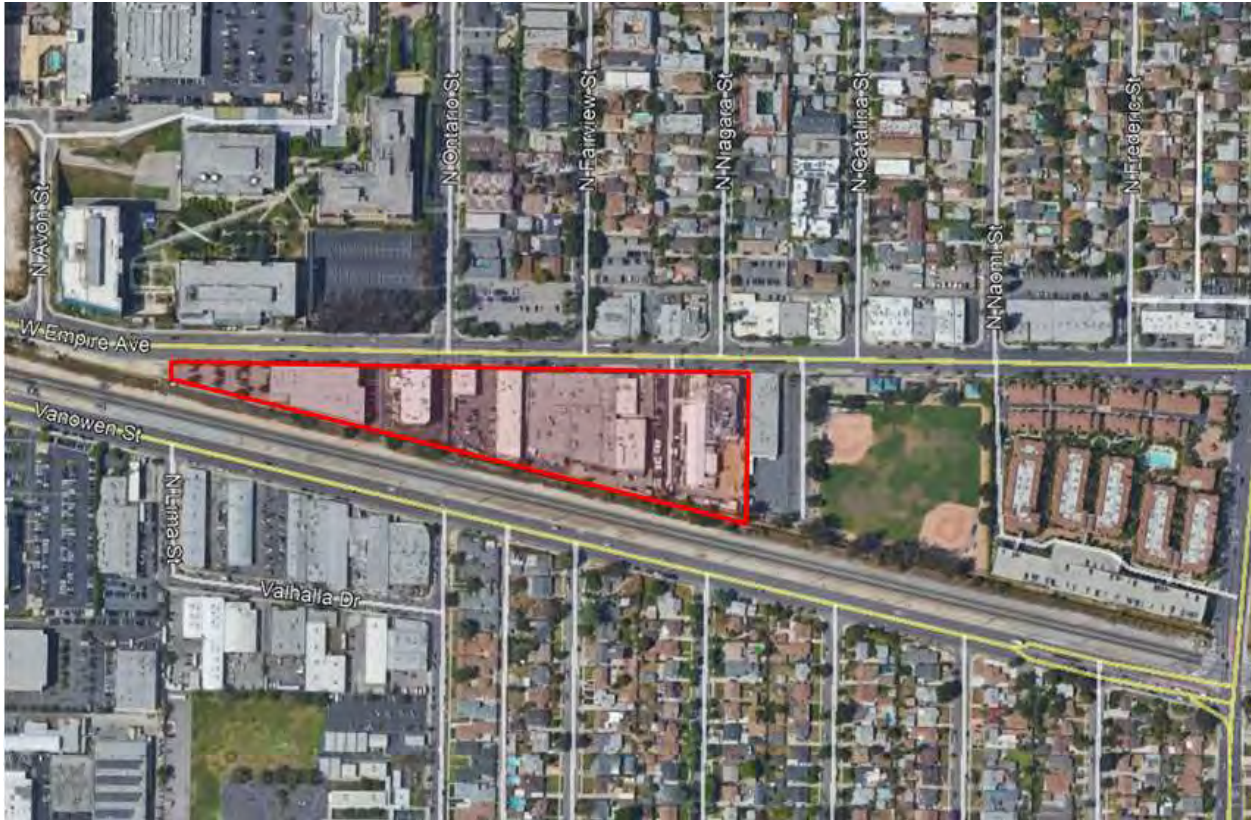
Net Unit Potential: 30 units

**Programs to Facilitate
Development:** 5, 9, 10, 11, 17,
19, 22

This opportunity site includes one parcel and is bounded by Empire Avenue, Ontario Street and Fairview Street. This parcel is currently zoned General Industrial (M-2) and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 58 dwelling units per acre. This would allow for mixed use residential development within a quarter mile of the existing Burbank Airport – South VC Line Metrolink Station, and approximately a half mile of Hollywood Burbank Airport and the proposed High Speed Rail Station. Additionally, this site is within close proximity of major regional employers including an Amazon Delivery Station, Nickelodeon, Cartoon Network, Netflix, Hasbro, Warner Brothers and Disney. City staff has been in ongoing discussions the property owner, about the redevelopment of the opportunity site as a residential project that seeks to maximize housing opportunities. The site is currently improved with a surface parking lot, and has an improvement-to-land value ratio of just 0.05. Redevelopment of this parcel would allow for up to 30 units. This site falls within the Housing Element program to allow for by-right ministerial review process for projects within the specific plans that include 100 dwelling units or fewer. As of May of 2022, the City has received an application on this site for SB 35 Streamlined Ministerial review for the development of 148 residential dwelling units 100% affordable to low-income households, well in excess of the 30 units assumed in the sites inventory.

	<p>Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.</p>
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GSSP 7 - Empire



Site Acreage: 6.4 acres

General Plan Land Use:

Regional Commercial (58 du/ac)
1 small parcel -- Institutional (0 du/ac)

Proposed Zoning:

Golden State SP (100 du/ac)

Net Unit Potential: 510 units

Programs to Facilitate Development:

5, 9, 10, 11, 17, 19, 20, 22

Site Description and Factors Supporting Development:

This site includes eight parcels totaling approximately seven acres. The properties are located along Empire Avenue. These parcels are currently zoned as General Industrial (M-2) and would be rezoned to allow for Mixed Use Transit Oriented Development at a density of 100 dwelling units per acre, to allow for mixed use residential development within a quarter mile of the existing Burbank Airport – South VC Line Metrolink Station, and approximately a half mile of Hollywood Burbank Airport and the proposed High Speed Rail Station. Additionally, these parcels are within close proximity of major regional employers including an Amazon Delivery Station, Nickelodeon, Cartoon Network, Netflix, Hasbro, Warner Brothers and Disney. The sites currently include uses such as storage and warehousing, light and heavy industrial and office. Most of the buildings were constructed prior to 1980.

In order for the level of projected housing development to occur in this opportunity site, small-lot consolidation will be necessary. This site has eight small parcels with six property owners, but as discussed in the Housing Element regarding small sites, the City has experience facilitating small-lot consolidation, with the five projects presented in Table I-45 (Examples of Small Lot Consolidation) involving the aggregation of multiple small parcels. In each of these instances, property owners were able to acquire adjacent small parcels that were either physically underdeveloped and/or economically underutilized to create a viable site which was then developed to a higher economic use. Four of the five

projects took advantage of density bonuses and provided affordable units. Other GSSP sites also contain small parcels that share similar characteristics of physical and/or economic underutilization, and in several instances are already under common ownership. With the increased densities and economic incentives to be provided under the specific plan, these small parcels will be ripe for consolidation and development.

Representatives of property owners and potential investors have expressed interest in multi-family development on these sites. For example, City staff has been in ongoing discussions with property owners, including Abs Properties, about the redevelopment of properties with residential projects that seek to maximize housing opportunities. Redevelopment of these parcels would allow for up to 510 units.

On November 29, 2021, the City received a Notice of Intent (NOI) to submit an application for a Streamlined Ministerial Approval Process under SB 35 for the 2 acre parcel within GSSP 7. The proposal is to construct a 100% affordable multi-family residential building with 340 units at 3000 W. Empire Avenue. On the same date, the City also received an NOI to submit an SB 35 application for the property at 3001 W. Empire located across the street to construct 131 affordable units. As of May 2022, the applicant is preparing updated applications to address City comments on the projects' compliance with applicable objective design and development standards.

Moreover, the City's Housing, Economic Development and Real Estate Division is in the process of preparing property information sheets detailing applicable zoning regulations, permitted density, etc. that can be used to help actively market the subject site. These property information worksheets for all the housing opportunity sites in the Housing Element will be completed in the third quarter of 2022 and posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway. The property information sheet will be posted on the City's website and will be updated every six months to account for any changes to zoning including proposed updates resulting from the Specific Plan update currently underway.

**Please Start Here, Instructions in Cell
A2, Table in A3:B15**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

General Information	
Jurisdiction Name	City of Burbank
Housing Element Cycle	6th Cycle
Contact Information	
First Name	Shipra
Last Name	Rajesh
Title	Associate Planner
Email	SRajesh@burbankca.gov
Phone	(818) 238-5250
Mailing Address	
Street Address	<u>150 N. Third St.</u>
City	Burbank
Zip Code	91502

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
N SAN FERNANDO/BETHANY	91504	2460010010	A	High Density Residential	NSFC	0	43	0.08	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	2.3			2.3	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
N SAN FERNANDO/BETHANY	91504	2460010011	A	High Density Residential	NSFC	0	43	0.08	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	2.3			2.3	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
N SAN FERNANDO/BETHANY	91504	2460010012	A	High Density Residential	NSFC	0	43	0.08	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	2.3			2.3	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
N SAN FERNANDO/BETHANY	91504	2460010013	A	High Density Residential	NSFC	0	43	0.08	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	2.2			2.2	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
1300 N SAN FERNANDO BLVD	91504	2460010014	A	Corridor Commercial	NSFC	0	27	0.21	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		2.0	1.8	3.8	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
1310 N SAN FERNANDO BLVD	91504	2460010033	A	Corridor Commercial	NSFC	0	27	0.13	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		1.2	1.1	2.3	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
1320 N SAN FERNANDO BLVD	91504	2460010036	A	Corridor Commercial	NSFC	0	27	0.65	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		5.8	5.1	10.9	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
Total: TOD 1-Carl's Jr	91504							1.29						9.0	9.0	8.0	26.0			
1000 N SAN FERNANDO BLVD	91502	2460006045	B	Corridor Commercial	NSFC	0	27	2.80	Store	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		22.6	22.6	45.2	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
1000 N SAN FERNANDO BLVD	91502	2460007036	B	Corridor Commercial	NSFC	0	27	3.63	Disc. depart store	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		29.4	29.4	58.8	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
Total: TOD 2-Kmart	91502							6.43							52.0	52.0	104.0			
923 N SAN FERNANDO BLVD	91502	2460021017	C	Corridor Commercial	NSFC	0	27	0.26	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		2.5	4.7	7.2	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
913 N SAN FERNANDO BLVD	91502	2460021018	C	Corridor Commercial	NSFC	0	27	0.17	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		1.6	3.1	4.7	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
911 N SAN FERNANDO BLVD	91502	2460021019	C	Corridor Commercial	NSFC	0	27	0.17	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		1.2	2.2	3.4	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
903 N SAN FERNANDO BLVD	91502	2460021020	C	Corridor Commercial	NSFC	0	27	0.30	Prof. building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		2.9	5.6	8.5	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
901 N SAN FERNANDO BLVD	91502	2460021027	C	Corridor Commercial	NSFC	0	27	0.26	Full service station	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		2.5	4.8	7.3	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
127 W BURBANK BLVD	91502	2460021028	C	Corridor Commercial	NSFC	0	27	0.13	Store	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		1.3	2.4	3.7	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
I-5 FWY/E BURBANK	91502	N/A	C	N/A		0	0	1.58	Vacant	Yes-Current	YES - State-Owned	Available	Not in Last Cycle					Vacant public land	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD 3-Caltrans/HOP	91502							2.87							12.0	11.0	23.0			
600 N SAN FERNANDO BLVD	91502	2460023044	D	Downtown	PD	0	87	6.38	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	388.2			388.2	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
731 N SAN FERNANDO BLVD	91502	2460023045	D	Downtown	PD	0	87	0.90	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	55			55		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
601 N SAN FERNANDO BLVD	91502	2460023046	D	Downtown	PD	0	87	2.81	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	170.7			170.7		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
600 N 1ST ST	91502	2460023047	D	Downtown	PD	0	87	0.29	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	17.9			17.9		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
230 E BURBANK BLVD	91502	2460023060	D	Downtown	PD	0	87	1.67	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	101.7			101.7	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
217 GRINNELL DR	91502	2460031007	D	Downtown	BCC-2	0	87	0.19	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	11.5			11.5	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
215 GRINNELL DR	91502	2460031008	D	Downtown	BCC-2	0	87	0.19	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	11.5			11.5	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
218 E BURBANK BLVD	91502	2460031016	D	Downtown	BCC-2	0	87	0.17	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	10.1			10.1	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
212 E BURBANK BLVD	91502	2460031018	D	Downtown	BCC-2	0	87	0.19	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	11.7			11.7	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
800 N SAN FERNANDO BLVD	91502	2460031019	D	Downtown	BCC-2	0	87	0.24	Bank/savings	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	14.6			14.6	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
840 N SAN FERNANDO BLVD	91502	2460031029	D	Downtown	BCC-2	0	87	0.16	Bank/savings	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	9.6			9.6	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
N SAN FERNANDO/GRINNEL	91502	2460031044	D	Downtown	BCC-2	0	87	0.16	Vacant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	9.8			9.8	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
800 N SAN FERNANDO BLVD	91502	2460031045	D	Downtown	BCC-2	0	87	0.44	Fast food-walkup	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	26.7			26.7	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest/High Resources, High Quality Transit Area
Total: TOD 4-Old IKEA	91502							13.80						839.0			839.0			

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
401 N 1ST ST	91502	2460023056	E	Downtown	PD	0	87	2.06	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	124.8			124.8	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan,	TCAC-High Resources, High Quality Transit Area
521 N 1ST ST	91502	2460023057	E	Downtown	PD	0	87	0.65	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	39.2			39.2		Proposed Downtown TOD Specific Plan,	TCAC-High Resources, High Quality Transit Area
Total: TOD 5-Ashley Home/El Pol	91502							2.71						164.0			164.0			
245 E MAGNOLIA BLVD	91502	2460023048	F	Downtown	PD	0	87	1.31	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	79.5			79.5		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
201 E MAGNOLIA BLVD	91502	2460023049	F	Downtown	PD	0	87	5.20	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	316.5			316.5		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
111 E MAGNOLIA BLVD	91502	2460023050	F	Downtown	PD	0	87	1.41	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	86.2			86.2		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
501 N 3RD ST	91502	2460023052	F	Downtown	PD	0	87	2.23	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	135.9			135.9		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
550 N 1ST ST	91502	2460023054	F	Downtown	PD	0	87	2.71	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	165.3			165.3		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
200 E CYPRESS AVE	91502	2460023063	F	Downtown	PD	0	87	2.35	Reg. shopping	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	143.3			143.3		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
(PRIV STREET AND YARD IMPS)	91502	2460023064	F	Downtown	PD	0	87	1.26	Private Street	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	76.9			76.9		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
555 N 3RD ST	91502	2460023996	F	Downtown	PD	0	87	0.27	Theater	Yes-Current	YES - City-Owned	Available	Not in Last Cycle	16.4			16.4		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD 6-Burbank Town Ctr	91502							16.75						1020.0			1020.0			
121 S GLENOAKS BLVD	91502	2453014002	G	Downtown	BCC-3	0	87	0.08	Prof building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	4.9			4.9	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
123 S GLENOAKS BLVD	91502	2453014003	G	Downtown	BCC-3	0	87	0.04	Store/resid combo	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	2.4			2.4	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
147 S GLENOAKS BLVD	91502	2453014008	G	Downtown	BCC-3	0	87	0.09	Store	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	2.3			2.3	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
356 E OLIVE AVE	91502	2453014012	G	Downtown	BCC-2	0	87	0.18	Prof building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	10.7			10.7	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
348 E OLIVE AVE	91502	2453014014	G	Downtown	BCC-2	0	87	0.18	Office building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	10.8			10.8	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
362 E OLIVE AVE	91502	2453014022	G	Downtown	BCC-2	0	87	0.06	Store	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	3.8			3.8	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
358 E OLIVE AVE	91502	2453014023	G	Downtown	BCC-2	0	87	0.12	Office building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	7.0			7.0	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
137 S GLENOAKS BLVD	91502	2453014024	G	Downtown	BCC-3	0	87	0.16	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	7.7			7.7	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
372 E OLIVE AVE	91502	2453014025	G	Downtown	BCC-3	0	87	0.13	Bank/savings	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	7.7			7.7	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
359 E ANGELENO AVE	91502	2453014026	G	Downtown	BCC-2	0	87	0.17	Parking lot/patron	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	10.5			10.5	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
353 E ANGELENO AVE	91502	2453014029	G	Downtown	BCC-2	0	87	0.35	Office building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	20.2			20.2		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD 8-Olive/Glenoaks	91502													88.0			88.0			
101 S 1ST ST, 400	91502	2453011029	H	Downtown	BCC-2	0	87	2.12	Office building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	129.2			129.2		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
235 S 1ST ST	91502	2453018017	H	Downtown	BCC-2	0	87	1.71	Restaurant	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	102.8			102.8	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD-10-Bjs/Black Angus	91502							3.83						232.0			232.0			
120 S VICTORY BLVD	91502	2451016011	I	North Victory	BCCM	0	27	2.14	Office building	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		18.6	18.6	37.2		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Moderate Resources, High Quality Transit Area
272 E OLIVE AVE	91502	2451016012	I	North Victory	BCCM	0	27	0.24	Auto serv/body	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		1.7	1.7	3.4	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Moderate Resources, High Quality Transit Area
264 W OLIVE AVE	91502	2451016013	I	North Victory	BCCM	0	27	0.19	Auto serv/body	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		1.8	1.8	3.6	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Moderate Resources, High Quality Transit Area
110 S VICTORY BLVD	91502	2451016014	I	North Victory	BCCM	0	27	0.31	Auto serv/body	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle		2.9	2.9	5.8	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Moderate Resources, High Quality Transit Area

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)	
Total: TOD 11-Victory/Olive	91502							2.88								25.0	25.0	50.0			
N FAIRVIEW/W EMPIRE	91504	2464006045	J	Regional Commercial	M-2	0	58	0.65	Parking lot/structure	Yes-Current	NO - Privately-Owned	Available	Not in Last Cycle	30.0			30.0	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area	
Total: GSSP-6 Fairview	91504													30.0			30.0				
137 E VERDUGO AVE	91502	2453019011	L	Downtown Commercial	BCC-2	0	87	0.17	Parking lot/patron	Yes-Current	NO - Privately-Owned	Pending Projects	In Last Cycle	4.8		25.8	30.6	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
121 E VERDUGO AVE	91502	2453019015	L	Downtown Commercial	BCC-2	0	87	0.51	Parking lot/patron	Yes-Current	NO - Privately-Owned	Pending Projects	In Last Cycle	14.7		79.6	94.3	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
103 E VERDUGO AVE	91502	2453019017	L	Downtown Commercial	BCC-2	0	87	0.16	Parking lot/patron	Yes-Current	NO - Privately-Owned	Pending Projects	In Last Cycle	4.5		24.6	29.1	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
Total: The Premier on First	91502							0.83						24.0		130.0	154.0				
W ALAMEDA/CALIFORNIA	91505	2483023419	M	Media District Commercial	PD	0	58	0.24	Vacant-Comm	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	2.5		21.6	24.1	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
W ALAMEDA/CALIFORNIA	91505	2483023420	M	Media District Commercial	PD	0	58	0.28	Vacant-Comm	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	2.9		24.4	27.3	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
3321 W OLIVE AVE	91505	2483023421	M	Media District Commercial	PD	0	58	0.28	Vacant-Comm	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	2.9		24.6	27.5	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
W OLIVE/N LIMA	91505	2483023422	M	Media District Commercial	PD	0	58	0.06	Vacant-Comm	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	0.6		5.2	5.8	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
3320 W ALAMEDA AVE	91505	2483023431	M	Media District Commercial	PD	0	58	0.16	Vacant-Comm	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	1.7		14.4	16.1	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
W OLIVE/N LIMA	91505	2483023432	M	Media District Commercial	PD	0	58	0.07	Vacant	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	0.8		6.6	7.4	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
3201 W OLIVE AVE	91505	2484024401	M	Media District Commercial	PD	0	58	0.15	Vacant-Comm	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	1.6		13.2	14.8	Currently vacant in highly urbanized area	Pending Entitlement	TCAC-High Resources, High Quality Transit Area	
Total: Bob Hope Center	91505							1.24						13.0		110.0	123.0				

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
3700 W RIVERSIDE DR	91505	2485005004	N	Media District Commercial	MDC-3	0	58	0.43	Car Wash	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	2.8		31.6	34.4	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
3700 W RIVERSIDE DR	91505	2485005014	N	Media District Commercial	MDC-3	0	58	0.08	Parking lot/patron	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	0.5		6.2	6.7	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
134 N SCREENLAND DR	91505	2485005015	N	Media District Commercial	MDC-3	0	58	0.10	Office Building	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	0.6		7.3	7.9	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
Total: 3700 Riverside	91505							0.61						4.0		45.0	49.0			
4100 W RIVERSIDE DR	91505	2485008034	O	Media District Commercial	MDC-3	0	58	0.35	Store and Office Combo	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	7.0		37.0	44.0	Improve/Land Value ratio < 1	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
Total: 4100 Riverside	91505							0.35						7.0		37.0	44.0			
537 E PALM AVE	91501	2455030011	P	High Density Residential	R-4	0	43	0.18	Single Family Residence	Yes-Current	NO - Privately-Owned	Pending Projects	In Last Cycle	1.0		4.0	5.0	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
529 E PALM AVE	91501	2455030013	P	High Density Residential	R-4	0	43	0.17	Four Units/4 Stories or Less	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	1.0		4.0	5.0	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
Total: 529-537 Palm Ave	91501							0.35						2.0		8.0	10.0			
2720 THORNTON AVE	91504	2464008013	Q	High Density Residential	R-4	0	43	0.20	Two Units/4 Stories or less	Yes-Current	NO - Privately-Owned	Pending Projects	In Last Cycle			2.0	2.0	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
Total: 2720 Thornton Ave	91504							0.2								2.0	2.0			
2814 W. EMPIRE AVE	91504	2464001017	R	Regional Commercial	M-2	0	58	0.8	Vacant Commercial	Yes-Current	NO - Privately-Owned	Pending Projects	Not in Last Cycle	118.0	29.0	1.0	148.0	Improve/Land Value ratio < 1, building pre-1980	Pending Entitlement	TCAC-High Resources, High Quality Transit Area
Total: 2814 W. Empire Ave	91504							0.8						118.0	29.0	1.0	148.0			

Identify Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
N GLENOAKS / E OLIVE	91502	2453008900	3.6	1.9			Shortfall of sites	0.1	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	5.5	Nonvacant	Parking lot lease	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
N GLENOAKS / E OLIVE	91502	2453008903	39.8	21.5			Shortfall of sites	0.9	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	61.3	Nonvacant	Gov't owned	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
348 E ORANGE GROVE AVE	91502	2453008905	15.9	8.6			Shortfall of sites	0.4	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	24.5	Nonvacant	Store/resid combo	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
301 E OLIVE AVE	91502	2453008908	23.9	12.9			Shortfall of sites	0.5	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	36.8	Nonvacant	Bank/savings	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
375 E OLIVE AVE	91502	2453008910	7.5	4.1			Shortfall of sites	0.2	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	11.6	Nonvacant	Parking lot/patron	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
E OLIVE / S 3RD	91502	2453008911	9.0	4.9			Shortfall of sites	0.2	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	13.8	Nonvacant	Parking lot/patron	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
374 E ORANGE GROVE AVE	91502	2453008912	28.8	15.6			Shortfall of sites	0.7	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	44.3	Nonvacant	Bank/savings	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
275 E OLIVE AVE	91502	2453009902	47.7	25.8			Shortfall of sites	1.8	Institutional	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	73.5	Nonvacant	City Hall/Admin Ctr	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
110 N GLENOAKS BLVD	91502	2455021906	69.8	37.8			Shortfall of sites	1.6	Institutional	R-4	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	107.6	Nonvacant	Central Library	Public Uses-Civic Center	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD 7-Civic Center	91502		246.0	133.0				6.2							379.0					
249 S GLENOAKS BLVD	91502	2453021026	7.7	4.1			Shortfall of sites	0.2	Downtown	BCC-3	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	11.7	Nonvacant	Auto serv/body	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
249 S GLENOAKS BLVD	91502	2453021027	3.4	1.8			Shortfall of sites	0.1	Downtown	BCC-3	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	5.3	Nonvacant	Auto serv/body	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
201 S GLENOAKS BLVD	91502	2453021029	10.0	5.3			Shortfall of sites	0.3	Downtown	BCC-3	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	15.4	Nonvacant	Restaurant	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
221 S GLENOAKS BLVD	91502	2453021030	8.2	4.3			Shortfall of sites	0.2	Downtown	BCC-3	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	12.5	Nonvacant	Store	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
354 E ANGELENO AVE	91502	2453021032	6.9	3.7			Shortfall of sites	0.2	High Density Residential	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	10.5	Nonvacant	Prof building	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
344 E ANGELENO AVE	91502	2453021033	6.9	3.7			Shortfall of sites	0.2	High Density Residential	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	10.6	Nonvacant	Prof building	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
336 E ANGELENO AVE	91502	2453021035	7.0	3.7			Shortfall of sites	0.2	High Density Residential	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	10.7	Nonvacant	Private school	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
320 E ANGELENO AVE	91502	2453021041	6.8	3.6			Shortfall of sites	0.2	High Density Residential	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	10.5	Nonvacant	Church	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
310 E ANGELENO AVE	91502	2453021046	14.0	7.4			Shortfall of sites	0.4	High Density Residential	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	21.4	Nonvacant	Parking lot/patron	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
300 E ANGELENO AVE	91502	2453021062	6.1	3.3			Shortfall of sites	0.2	High Density Residential	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	87	9.4	Nonvacant	Church		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD 9-Fosters Freeze	91502		77.0	41.0				1.9							118.0					
353 E SAN JOSE AVE	91502	2460034021	4.4	4.2		39.8	Shortfall of sites	0.3	Downtown	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	48.4	Nonvacant	Private school	Improve/Land Value ratio < 1	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
409 N GLENOAKS BLVD	91502	2460035001	1.4	1.3		12.3	Shortfall of sites	0.1	Downtown	BCC-3	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	15.0	Nonvacant	Parking lot/patron	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
369 E MAGNOLIA BLVD	91502	2460035003	2.3	2.1		20.4	Shortfall of sites	0.2	Downtown	BCC-3	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	24.8	Nonvacant	Restaurant	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
361 E MAGNOLIA BLVD	91502	2460035005	2.2	2.1		19.8	Shortfall of sites	0.2	Downtown	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	24.0	Nonvacant	Office building	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
353 E MAGNOLIA BLVD	91502	2460035007	2.2	2.1		20.1	Shortfall of sites	0.2	Downtown	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	24.5	Nonvacant	Store/resid combo	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
352 E SAN JOSE AVE	91502	2460035008	2.3	2.1		20.4	Shortfall of sites	0.2	Downtown	BCC-2	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	24.8	Nonvacant	Parking lot/patron	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
320 E SAN JOSE AVE	91502	2460035014	3.6	3.4		32.3	Shortfall of sites	0.3	Downtown	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	39.3	Nonvacant	Parking lot/patron	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
300 E SAN JOSE AVE	91502	2460035016	4.2	4.0		38.2	Shortfall of sites	0.3	Downtown	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	46.5	Nonvacant	Parking lot/patron	Improve/Land Value ratio < 1, building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
344 E SAN JOSE AVE	91502	2460035017	4.6	4.3		41.4	Shortfall of sites	0.4	Downtown	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	50.4	Nonvacant	Private school		Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
321 E MAGNOLIA BLVD	91502	2460035018	6.8	6.4		61.2	Shortfall of sites	0.5	Downtown	PD	Downtown TOD Specific Plan	Downtown TOD Specific Plan	20	200	74.4	Nonvacant	Club/Lodge Hall	Building pre-1980	Proposed Downtown TOD Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: TOD 12-YMCA	91502		34.0	32.0		306.0		6.5							372.0					
3075 N LIMA ST	91504	2466001015			6.6	6.6	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	13.2	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3079 N LIMA ST	91504	2466001016			6.5	6.5	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	13.1	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3310 COHASSET ST	91504	2466001022			6.4	6.4	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	12.7	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3094 N AVON ST	91504	2466001023			6.5	6.5	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	13.0	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3090 N AVON ST	91504	2466001024			6.4	6.4	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	12.9	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3086 N AVON ST	91504	2466001025			12.3	12.3	Shortfall of sites	0.3	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	24.6	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3080 N AVON ST	91504	2466001026			7.5	7.5	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	14.9	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3071 N LIMA ST	91504	2466001029			6.3	6.3	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	12.6	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3083 N LIMA ST	91504	2466001030			13.0	13.0	Shortfall of sites	0.3	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	25.9	Nonvacant	Warehouse, storage	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3059 N CALIFORNIA ST	91504	2466001045			6.2	6.2	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	12.4	Vacant in highly urbanized area	Vacant	Vacant in highly urbanized area	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3063 N CALIFORNIA ST	91504	2466001046			6.8	6.8	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	13.6	Vacant in highly urbanized area	Vacant	Vacant in highly urbanized area	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3300 N SAN FERNANDO BLVD	91504	2466001063			21.4	21.4	Shortfall of sites	0.5	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	42.8	Nonvacant	Warehouse, storage		Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3089 N LIMA ST	91504	2466001064			6.5	6.5	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	13.0	Nonvacant	Warehouse, storage	Improve/Land Value ratio < 1	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3099 N LIMA ST	91504	2466001077			13.2	13.2	Shortfall of sites	0.3	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	26.4	Nonvacant	Light industrial	Improve/Land Value ratio < 1	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
3320 N SAN FERNANDO BLVD	91504	2466001081			41.4	41.4	Shortfall of sites	1.0	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	82.9	Nonvacant	Light industrial		Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: GSSP-1 Lima/Avon	91504				167.0	167.0		17.1							334.0					
3333 N SAN FERNANDO BLVD	91504	2466005003			42.6	42.4	Shortfall of sites	0.9	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	85.0	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3207 N SAN FERNANDO BLVD	91504	2466005013			24.2	24.1	Shortfall of sites	0.5	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	48.2	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
N SAN FERNANDO/N HOLLYWOOD	91504	2466005017			9.5	9.4	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	18.9	Nonvacant	Parking lot/structure	Improve/Land Value ratio < 1	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
N SAN FERNANDO/N HOLLYWOOD	91504	2466005018			11.0	11.0	Shortfall of sites	0.2	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	22.0	Nonvacant	Parking lot/structure	Improve/Land Value ratio < 1	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3303 N SAN FERNANDO BLVD	91504	2466005024			63.8	63.5	Shortfall of sites	1.3	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	127.3	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3301 N SAN FERNANDO BLVD	91504	2466005025			60.6	60.4	Shortfall of sites	1.3	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	121.0	Nonvacant	Light industrial		Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3024 N HOLLYWOOD WAY	91504	2466006002			2.7	2.7	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	5.3	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3022 N HOLLYWOOD WAY	91504	2466006003			3.1	3.1	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.1	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3020 N HOLLYWOOD WAY	91504	2466006004			2.9	2.9	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	5.9	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3018 N HOLLYWOOD WAY	91504	2466006005			3.1	3.1	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.2	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3016 N HOLLYWOOD WAY	91504	2466006006			3.1	3.1	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.1	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3014 N HOLLYWOOD WAY	91504	2466006007			3.0	3.0	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.1	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3012 N HOLLYWOOD WAY	91504	2466006008			3.0	3.0	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.0	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
N HOLLYWOOD/TULARE	91504	2466006009			3.1	3.1	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.1	Nonvacant	Parking lot/structure	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
N HOLLYWOOD/TULARE	91504	2466006010			3.0	3.0	Shortfall of sites	0.1	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	6.1	Nonvacant	Parking lot/structure	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
3000 N HOLLYWOOD WAY	91504	2466006011			14.4	14.3	Shortfall of sites	0.3	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	28.7	Nonvacant	Warehouse, storage	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
Total: GSSP-2 N. Hollywood Way	91504				253.0	252.0		5.3							505.0					
2210 N SCREENLAND DR	91505	2463001005	166.1	89.2			Shortfall of sites	3.0	Golden State	M-1	Golden State Specific Plan	Golden State Specific Plan	20	120	255.3	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
2211 N HOLLYWOOD WAY	91505	2463001006	18.6	10.0			Shortfall of sites	0.3	Golden State	M-1	Golden State Specific Plan	Golden State Specific Plan	20	120	28.7	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
2205 N HOLLYWOOD WAY	91505	2463001007	17.8	9.5			Shortfall of sites	0.3	Golden State	M-1	Golden State Specific Plan	Golden State Specific Plan	20	120	27.3	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
2201 N HOLLYWOOD WAY	91505	2463001008	17.7	9.5			Shortfall of sites	0.3	Golden State	M-1	Golden State Specific Plan	Golden State Specific Plan	20	120	27.2	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Information-1 (Underutilization)	Information-2 (Likelihood of Development)	Information-3 (Availability to Resources)
City of Burbank	3520 W VALHALLA DR	91505	2463001011	131.5	70.7			Shortfall of sites	2.4	Golden State	M-1	Golden State Specific Plan	Golden State Specific Plan	20	120	202.2	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	2231 N HOLLYWOOD WAY	91505	2463001012	89.3	48.0			Shortfall of sites	1.6	Golden State	M-1	Golden State Specific Plan	Golden State Specific Plan	20	120	137.3	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	Total: GSSP-3 Valhalla	91505		441.0	237.0				8.1							678.0					
City of Burbank	2340 N HOLLYWOOD WAY	91505	2463010001			214.0	214.0	Shortfall of sites	4.5	Golden State	M-2	Golden State Specific Plan	Golden State Specific Plan	20	120	428.0	Nonvacant	Office building	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-Highest Resources, High Quality Transit Area
City of Burbank	Total: GSSP-4 Logix	91505				214.0	214.0		4.5							428.0					
City of Burbank	N ONTARIO/W EMPIRE	91505	2464004036			83.0	83.0	Shortfall of sites	1.7	Regional Commercial	PD	Golden State Specific Plan	Golden State Specific Plan	20	120	166.0	Nonvacant	Parking lot/structure	Improve/Land Value ratio < 1	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	Total: GSSP-5 Ontario	91505				83.0	83.0		1.7							166.0					
City of Burbank	3030 W EMPIRE AVE	91504	2464001002	20.3	11.1			Shortfall of sites	0.4	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	31.4	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	3020 W EMPIRE AVE	91504	2464001003	21.0	11.5			Shortfall of sites	0.4	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	32.5	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	2820 W EMPIRE AVE	91504	2464001007	38.3	20.9			Shortfall of sites	0.7	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	59.2	Nonvacant	Heavy industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	3110 W EMPIRE AVE	91504	2464001015	42.6	23.3			Shortfall of sites	0.8	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	65.9	Nonvacant	Office building		Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	3000 W EMPIRE AVE	91504	2464001019	102.2	55.7			Shortfall of sites	1.9	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	157.9	Nonvacant	Light industrial	Building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	2890 W EMPIRE AVE	91504	2464001020	44.6	24.3			Shortfall of sites	0.9	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	68.9	Nonvacant	Light industrial	Improve/Land Value ratio < 1, building pre-1980	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	3120 W EMPIRE AVE	91504	2464001021	57.8	31.5			Shortfall of sites	1.1	Regional Commercial	M-2	Golden State Specific Plan	Golden State Specific Plan	20	100	89.3	Nonvacant	Warehouse, storage	Improve/Land Value ratio < 1	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	W EMPIRE/VANOWEN	91504	2464001906	3.2	1.7			Shortfall of sites	0.1	Institutional	RR	Golden State Specific Plan	Golden State Specific Plan	20	100	4.9	Vacant in highly urbanized area	Government, public	Vacant in highly urbanized area	Proposed Golden State Specific Plan, Refer to Appendix D, Exhibit D-1: TOD and GSSP Opportunity Sites	TCAC-High Resources, High Quality Transit Area
City of Burbank	Total: GSSP-7 Empire	91504		330.0	180.0				6.4							510.0					

Table C: Land Use, Table Starts in A2

Zoning Designation (From Table A, Column G)	General Land Uses Allowed
NSFC	Mixed-Use (MC Section 10-1-2701)
PD	Variety of housing (MC Section 10-1-655)
BCC-2	Residential above Commercial w/CUP (MC Section 10-1-502)
BCC-3	Residential above commercial w/ CUP and Residential only permitted (MC Section 10-1-502)
BCCM	Residential not permitted (MC Section 10-1-502)
C-3	Residential above Commercial w/CUP (MC Section 10-1-502)
M-2	Residential not permitted (MC Section 10-1-502)
C-R	Residential not permitted (MC Section 10-1-502)
R-4	Residential only permitted (MC Section 10-1-627)
MDC-3	Residential above Commercial w/CUP (MC Section 10-1-502)

Appendix E

Adequate Sites Program Alternative Checklist

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

1800 Third Street, Suite 430
P. O. Box 952053
Sacramento, CA 94252-2053
(916) 323-3177
FAX (916) 327-2643



Adequate Sites Program Alternative Checklist
Government Code Section 65583.1(c)

As provided in Government Code Section 65583.1(c), local governments can rely on existing housing units to address up to 25 percent of their adequate sites requirement by counting existing units made available or preserved through the provision of “committed assistance” to low- and very low-income households at affordable housing costs or affordable rents. The following is a checklist intended to provide guidance in determining whether the provisions of Government Code Section 65583.1(c) can be used to address the adequate sites program requirement. Please be aware, all information must be provided in the housing element to demonstrate compliance.

HE Page #

<p>65583.1(c)(4) Is the local government providing, or will it provide “committed assistance” during the period of time from the beginning of the RHNA projection period (6/30/21) to the end of the first 3 years of the housing element planning period (10/15/24)? See the definition of “committed assistance” at the end of the checklist.</p>	<p>x Yes <input type="checkbox"/> No</p>	
<p>65583.1(c)(1)(A) Has the local government identified the specific source of “committed assistance” funds? If yes: specify the amount and date when funds will be dedicated through a (legally enforceable agreement). <u>\$5,000,000</u> Date: <u>October 2024</u></p>	<p>x Yes <input type="checkbox"/> No</p>	
<p>65583.1(c)(3) Has at least some portion of the regional share housing need for very low-income (VL) or low-income (L) households been met in the current or previous planning period? Specify the number of affordable units permitted/constructed in the previous period. Specify the number affordable units permitted/constructed in the current period and document how affordability was established.</p>	<p>x Yes <input type="checkbox"/> No <u>144</u> _____</p>	
<p>65583.1(c)(1)(B) Indicate the total number of units to be assisted with committed assistance funds and specify funding source. Number of units: <u>10</u> Funding source: <u>Successor Agency Housing Asset Fund</u></p>		
<p>65583.1(c)(1)(B) Will the funds be sufficient to develop the identified units at affordable costs or rents?</p>	<p>x Yes <input type="checkbox"/> No</p>	
<p>65583.1(c)(1)(C) Do the identified units meet the substantial rehabilitation, conversion, or preservation requirements as defined? Which option? <u>conversion</u></p>	<p>x Yes <input type="checkbox"/> No</p>	
<p>Note: If you cannot answer “yes” to all of the general requirements questions listed above, your jurisdiction is not eligible to utilize the alternate adequate sites program provisions set forth in Government Code Section 65583.1(c).</p>		

65583.1(c) Checklist

CONVERSION OF MULTIFAMILY RENTAL AND OWNERSHIP UNITS OF 3 OR MORE OR FORECLOSED PROPERTIES FROM NON-AFFORDABLE TO AFFORDABLE (65583.1(c)(2)(B))		
	Program # _____	Page # _____
Include reference to specific program action in housing element.		
65583.1(c)(2)(B) Specify the number of multifamily rental (3 or more units) to be converted. Specify the number multifamily ownership units to be converted. Specify the number of foreclosed properties acquired. Date Acquired? Will these units be for rent?	10 _____ _____ _____	
65583.1(c)(2)(B)(i) Will the acquired units be made affordable to low- or very low-income households?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
65583.1(c)(2)(B)(ii) For units to be converted to very-low income, were those units affordable to very low-income households at the time they were identified for acquisition? For units to be converted to low-income, were those units affordable to low-income households at the time they were identified for acquisition?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	
65583.1(c)(2)(B)(iii) If the acquisition results in the displacement of very low- or low-income households, is the local government providing relocation assistance consistent with Government Code Section 7260, including rent and moving expenses equivalent to four (4) months, to those occupants permanently or temporary displaced?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
65583.1(c)(2)(B)(iv) Will units be decent, safe, and sanitary upon occupancy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
65583.1(c)(2)(B)(v) Will affordability and occupancy restrictions be maintained at least 55 years?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
65583.1(c)(2)(B)(vi)* For conversion of multifamily ownership units: Has at least an equal share of newly constructed multifamily rental units affordable to lower-income households been constructed within the current planning period or will be constructed by the of program completion as the number of ownership units to be converted? (Note: this could be demonstrated by providing certificates of occupancy) Specify the number of affordable multifamily rental units constructed in the planning period.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A # of lower-income units: _____	

65583.1(c) Checklist

DEFINITIONS:

Committed Assistance: When a local government has entered into a legally enforceable agreement within a specific timeframe spanning from the beginning of the RHNA projection period through the end of the second year of the housing element planning period, obligating funds for affordable units available for occupancy within two years of the agreement.

Assisted Housing Development: A multifamily rental housing development that receives governmental assistance under any of the following programs:

- (A) New construction, substantial rehabilitation, moderate rehabilitation, property disposition, and loan management set-aside programs, or any other program providing project-based assistance, under Section 8 of the United States Housing Act of 1937, as amended (42 U.S.C. Sec. 1437f).
- (B) The following federal programs:
 - (i) The Below-Market-Interest-Rate Program under Section 221(d)(3) of the National Housing Act (12 U.S.C. Sec. 1715l(d)(3) and (5)).
 - (ii) Section 236 of the National Housing Act (12 U.S.C. Sec. 1715z-1).
 - (iii) Section 202 of the Housing Act of 1959 (12 U.S.C. Sec. 1701q).
- (C) Programs for rent supplement assistance under Section 101 of the Housing and Urban Development Act of 1965, as amended (12 U.S.C. Sec. 1701s).
- (D) Programs under Sections 514, 515, 516, 533, and 538 of the Housing Act of 1949, as amended (42 U.S.C. Sec. 1485).
- (E) Section 42 of the Internal Revenue Code.
- (F) Section 142(d) of the Internal Revenue Code (tax-exempt private activity mortgage revenue bonds).
- (G) Section 147 of the Internal Revenue Code (Section 501(c)(3) bonds).
- (H) Title I of the Housing and Community Development Act of 1974, as amended (Community Development Block Grant Program).
- (I) Title II of the Cranston-Gonzales National Affordable Housing Act of 1990, as amended (HOME Investment Partnership Program).
- (J) Titles IV and V of the McKinney-Vento Homeless Assistance Act of 1987, as amended, including the Department of Housing and Urban Development's Supportive Housing Program, Shelter Plus Care program, and surplus federal property disposition program.
- (K) Grants and loans made by the Department of Housing and Community Development, including the Rental Housing Construction Program, CHRP-R, and other rental housing finance programs.
- (L) Chapter 1138 of the Statutes of 1987.
- (M) The following assistance provided by counties or cities in exchange for restrictions on the maximum rents that may be charged for units within a multifamily rental housing development and on the maximum tenant income as a condition of eligibility for occupancy of the unit subject to the rent restriction, as reflected by a recorded agreement with a county or city:
 - (i) Loans or grants provided using tax increment financing pursuant to the Community Redevelopment Law (Part 1 (commencing with Section 33000) of Division 24 of the Health and Safety Code).
 - (ii) Local housing trust funds, as referred to in paragraph (3) of subdivision (a) of Section 50843 of the Health and Safety Code.
 - (iii) The sale or lease of public property at or below market rates.
 - (iv) The granting of density bonuses, or concessions or incentives, including fee waivers, parking variances, or amendments to general plans, zoning, or redevelopment project area plans, pursuant to Chapter 4.3 (commencing with Section 65915).

Assistance pursuant to this subparagraph shall not include the use of tenant-based Housing Choice Vouchers (Section 8(o)) of the United States Housing Act of 1937, 42 U.S.C. Sec. 1437f(o), excluding subparagraph (13) relating to project-based assistance). Restrictions shall not include any rent control or rent stabilization ordinance imposed by a county, city, or city and county.

Appendix F

Community Participation

F-1. Workshop Notice/Announcement

F-2. Workshop Presentation

F-3. Summary of Community Workshop Input

F-4. Housing Element Survey

F-5. Housing Element Survey Results

F-6. Comment Letters on Draft Housing Element

Appendix F-1: Community Workshop Notice and Announcements



BURBANK'S PLAN FOR HOUSING Join us for a Virtual Community Workshop

Housing Element Update & Environmental Justice Discussion



This workshop will provide an overview of the Housing Element and provide you an opportunity to give your valuable input on the housing needs faced by Burbank's residents and workforce. Come learn more and share your ideas on the following:

- ✓ What are Burbank's most important housing needs?
- ✓ What options should the City pursue to address its housing needs within the Housing Element?
- ✓ What strategies can help reduce health risks facing Burbank's disadvantaged communities?

When?

Saturday, October 3
11:00 a.m. – 12:30 p.m.

Where?

burbankhousingelement.com

A link to the meeting will be posted on the project website above prior to the meeting date. You can also learn more about the housing element and take our survey. *(available October 3rd)*



Please note that a second community workshop will be held in the fall focusing on the Housing Element sites inventory.

For more information, contact Lisa Frank, Senior Planner at (818) 238-5250 or LFrank@burbankca.gov



burbankhousingelement.com

Scan code or visit website for translation enabled information

Translation dropdown located in top right corner



Scan code or visit website for translation enabled information

Translation dropdown located in top right corner

Community Workshop Announcement on Housing Element
Website: <https://www.burbankhousingelement.com/>



Announcements

English

- **Mar. 31, 2021 at 6:00 PM** – Environmental Scoping Meeting – [Click here](#) for meeting information.
- **Feb. 27, 2021 – Workshop #2:** CEQA Scoping Meeting. Recording of the meeting is available to watch below.
- **Feb. 17, 2021** – Informational workshop regarding updates to development standards for supportive housing, transitional housing, and emergency shelters in the City (Housing Element implementation). Recording of the meeting is available to watch below.
- **Burbank Housing Element Survey Results** – [Click here](#).
- **Oct. 3, 2020 – Workshop #1:** Burbank's Plan for Housing Virtual Community Workshop was on Saturday, October 3rd and the recording is available to watch below. Community Workshop Input – [Click here](#).

Virtual Community Workshop #2: CEQA Scoping Meeting (2/27/2021)

A screenshot of a virtual community workshop interface. The title bar reads 'Verbal Questions & Comments' and 'Housing Element Community'. Below the title bar, there is a list of instructions: 'Approximately 10 minutes total', '2 minutes to ask questions or provide comments', and 'Use "raise hand"'. A play button icon is visible in the center of the screenshot. The interface also shows a grid of participants and a 'Raise Hand' button.

Appendix F-2: Community Workshop #2 Presentation

<p>Burbank Housing Element and General Plan Updates</p> <p>Community Workshop #2 CEQA Scoping Meeting 2.27.2021</p>	<h3>Meeting Information</h3> <ul style="list-style-type: none"> 1.5 hours total Presentation with question/answers throughout <ol style="list-style-type: none"> 1. Review of Potential Housing Sites 2. Overview of New Housing Programs 3. Scoping for Environmental Impact Report (EIR) Streaming on YouTube Recording & will be posted to project webpage
<h3>Opportunities to Share Input</h3> <p>During the workshop:</p> <ul style="list-style-type: none"> Q&A box for questions & comments 10 min. verbal question & comment breaks Some comments & questions will be read aloud <p>After the workshop:</p> <ul style="list-style-type: none"> housingelement@burbankca.gov www.burbankhousingelement.com (818) 238-5250 – Planning Division 	<h3>Key Acronyms & Terms</h3> <ul style="list-style-type: none"> HCD = Department of Housing and Community Development SCAG = Southern California Association of Governments RHNA = Regional Housing Needs Assessment EIR = Environmental Impact Report TOD = Transit Oriented Development General Plan & Specific Plans <ul style="list-style-type: none"> Downtown Burbank TOD and Golden State Affordable Housing – housing that costs no more than 30% of household income <ul style="list-style-type: none"> Income levels - Very Low, Low, Moderate (Above Moderate) Rent or sale prices restricted by affordability covenant/deed restriction (in most cases)
<h3>Why Are We Here?</h3> <p>The City is addressing State-required updates to the City's General Plan (GP) Burbank2035</p> <ul style="list-style-type: none"> Housing Element Safety Element Environmental Justice goals-policies-objectives throughout (new requirement) <p>Housing Element Must update every 8 years</p>	<h3>Schedule</h3> <ul style="list-style-type: none"> State Certification of Housing Element by October 2021
<h3>Community Outreach</h3> <ul style="list-style-type: none"> Stakeholder meetings: service providers, developers & business community (Aug. 2020) Virtual Community Workshop #1 (Oct. 2020) On-Line Community Survey (Sep-Dec 2020) <ul style="list-style-type: none"> 226 respondents City Council and Planning Board Study Sessions (July 2020, Jan 2021) <p>Visit project website for input received to date www.burbankhousingelement.com</p>	<h3>Housing Element Context</h3> <ul style="list-style-type: none"> 2017 Burbank Affordable Housing Analysis and Strategy 2019 City Council goal to produce 12,000 new housing units by 2035 2021-2029 (6th cycle) Housing Element <ul style="list-style-type: none"> ID sites for future development ID programs to address housing needs

Regional Housing Needs Assessment - RHNA



- The RHNA represents the minimum number of housing units **each** community in the State is required to provide "adequate sites" for through zoning.

2014-2021 Burbank Housing Element RHNA Sites Inventory


2021-2029 RHNA

Income Category	Income Amount (3 person HH)	2021-2029 RHNA	% of Total
Vary Low	< \$50,700	2,553	29%
Low	\$50,700 - \$81,100	1,418	16%
Moderate	\$81,100 - \$83,500	1,409	16%
Above Moderate	> \$83,500	3,392	39%
Total		8,772	100%

- 8,772 housing units total
- More than 3x compared to current 2014-2021 Housing Element
- Falls within City Council housing production goal of 12,000 new units



Approved and Pending Projects



Approved Projects:

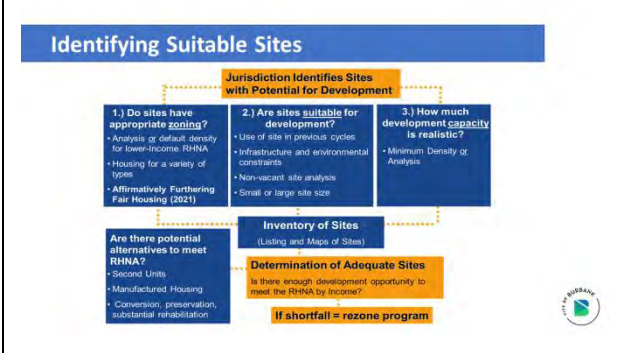
1. New City Center & Skyway
2. City Center - 200 West 9th Street
3. City Center - 100 West 9th Street
4. City Center - 100 West 9th Street
5. City Center - 100 West 9th Street
6. City Center - 100 West 9th Street

Pending Projects:

1. City Center - 100 West 9th Street
2. City Center - 100 West 9th Street
3. City Center - 100 West 9th Street
4. City Center - 100 West 9th Street
5. City Center - 100 West 9th Street
6. City Center - 100 West 9th Street

Approved = 919 housing units

Pending = 1,306 housing units



Identifying Sites

- Community survey - top 4 preferences



Downtown Burbank


Downtown Burbank - North San Fernando

Golden State/Airport District

Media District

Opportunities to Share Input

- Use Q&A box to share your questions/comments about sites
- Time depending, some questions and comments will be read aloud



Identifying Sites

Downtown Burbank - Overview



Identifying Sites

North San Fernando area

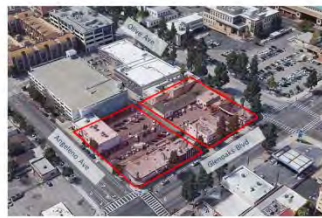


• Approximately 10.7 acres



Identifying Sites

Downtown Burbank – Olive & Glenoaks



• 1.4 Acres



Identifying Sites

Burbank Town Center
Mall area



• Approximately 32 acres



Identifying Sites

Civic Center



• Approximately 4.28 acres



Questions/Comments from Q&A

Downtown Burbank



Questions/Comments from Q&A

Downtown Burbank



Identifying Sites

Golden State area –
Lima/Avon



• Approximately 4.0 acres



Identifying Sites

Golden State area –
N. Hollywood Way & N. San
Fernando Blvd.



• Approximately 5.3 Acres



Identifying Sites

Golden State area – Logix



• Approximately 4.5 acres



Questions/Comments from Q&A

Golden State district



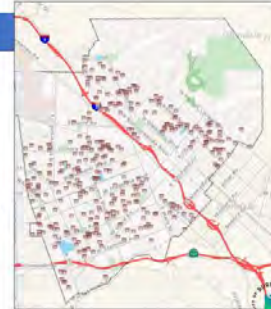
Accessory Dwelling Units (ADUs)

- ADUs are small backyard units either attached or detached from a single-family home
- Trends suggest City could expect 125 ADU permits/year with the addition of incentives
- SCAG analysis shows 70% of ADUs offered at rents affordable to low and moderate income



Accessory Dwelling Units

- ADUs are distributed throughout the City
- Over 2021-2029 housing element, est. 1000 ADUs
 - 700 ADUs can contribute towards City's low/mod. income RHNA



Alternative Site Options

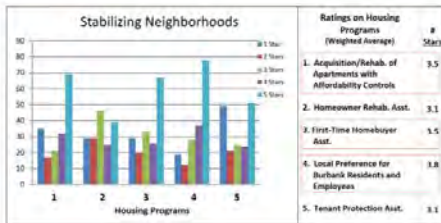
- Explore acquisition/rehabilitation of existing housing units
- Motel Conversions



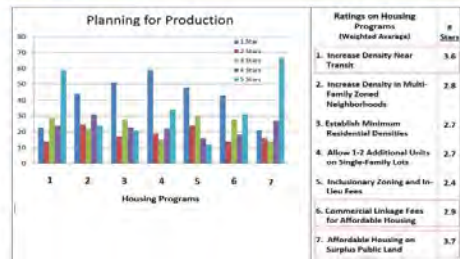
Housing Element Programs



Programs



Programs



Programs



Programs



Ideas for New Programs

- Specific Plan Areas: Golden State, Downtown TOD & Media District
- Higher density housing near transit and jobs
 - Objective, clear development standards to streamline review
 - Program EIRs for projects to tier off

- Updated multi-family development standards
- Re-evaluate parking, setbacks, height, and other development standards, to make development of smaller sites more feasible

- Zoning to facilitate variety of housing types
- Micro-units, townhouses, live/work units



Break for Verbal Questions & Comments

- Approximately 10 minutes total
- 2 minutes to ask questions or provide comments
- Use "raise hand"



Appendix F-3: Summary of Community Workshop Input

City of Burbank *Housing Element & Environmental Justice* ***Community Workshop Input***



On October 3rd 2020, City Community Development Department staff and consultants conducted a virtual community workshop to solicit public input on the Housing Element update and the new Environmental Justice component of the General Plan. Twenty-three members of the public participated in the workshop, and provided feedback via on-line polling and question and answers. The following summarizes the input received at the workshop, including staff responses to participant questions.

Polling Questions

1. How long have you lived in Burbank? 16 respondents

- 1 person 1-2 years
- 3 persons 6-10 years
- 3 persons 11-20 years
- 8 persons 21+ years
- 1 person Work in Burbank but live in another City

2. What type of housing unit you live in? 17 respondents

- 9 persons Detached single-family house
- 4 persons Duplex/triplex/fourplex
- 2 persons Condominium/townhome
- 1 person Apartment
- 1 person Work in Burbank but live in another City

3. Which of these issues do you see as being Burbank's most important housing needs? 13 respondents

- 10 persons Lack of housing for Burbank's workforce
- 8 persons Housing for our homeless population

7 persons Housing for Burbank’s seniors and disabled population

3 persons Deteriorated housing conditions

3 persons Overcrowded housing

4. What strategies should the City pursue to meet its RHNA obligations? 13 respondents

9 persons Tiny homes/micro units

8 persons Increased densities near transit

6 persons Incentives for accessory dwelling units (ADUs)

6 persons Motel conversions

3 persons Allow slightly increased densities in single-family neighborhoods to reduce the number of multi-family sites needed

2 persons Increased densities in multi-family zoned neighborhoods

5. In evaluating strategies to address environmental justice issues faced by Burbank’s low income and disadvantaged communities, which of the following environmental justice issues do you see as being the highest priority? 16 respondents

13 persons High housing costs

8 persons Public health

7 persons Environmental pollution

6 persons Unemployment

3 persons Linguistic isolation (non-English speaking)

2 persons Increased densities in multi-family zoned neighborhoods

Questions and Answers

1. How does City Council’s goal to produce 12,000 housing units by 2034 pace with the expected future job growth? How much will it improve the Job-Housing ratio in the City?

Staff Response:

- *The goal of 12,000 housing units is aspirational, but it is consistent with Burbank’s projected RHNA which has increased from 2,600 to 8,700 in the last 8 years.*
- *We anticipate a growth in employment with current developments like Avion and Media Studio North. Additionally, the City has been able to attract major employers like Netflix and Tip Mouse.*
- *Even if Burbank were to achieve its housing goal, the City might not be able to keep pace with projected employment growth. However, we won’t be losing ground as we have in the past.*

2. Given the water and power shortage, how will the City accommodate the increase in electricity and water demand from 12,000 additional housing units? Will the City build another powerplant?

Staff Response:

- *Burbank2035 General Plan, adopted in 2013, anticipated projected growth of 5,900 units. The 8,700 units that is our fair share requirement coming through SCAG is something we have to look at within the context of our infrastructure/utility capacity.*
- *An environmental assessment will be conducted to determine the location of additional housing units that is consistent with Council goals of responsible development and protecting single-family neighborhoods, and at the same time being able to have community facility and infrastructure to support additional housing.*
- *The Environmental Impact Report (EIR) process will be initiated early next year. Topics of energy and water will be investigated as a part of the review process.*

3. Can you elaborate on what will happen if the City does not meet the required RHNA numbers and does not build the required housing? How will it impact the City, and alternatively, how would meeting the RHNA number help the City?

Staff Response:

- *While the majority of cities don't meet their RHNA numbers, particularly for lower income households which typically require subsidies, it is important for cities to set the stage through zoning to enable development of projected housing needs without undue constraints.*
- *The State is trying to get cities to help with the housing crisis. Cities underproducing housing to address their RHNA goals can be subjected to SB35 (by right housing development). There is a trend in the recent legislature to hold cities more accountable to meet their housing needs.*

4. Where will the proposed housing be located within the City?

Staff Response:

- *Specific plan areas - Golden State Specific Plan, Downtown specific plan area (Burbank Center Plan), and Media District – areas with potential for high density and Transit Oriented Development. Focus will be on employment and transit centers within the City which have opportunity for infill development.*
- *Housing location will be looked at in more detail during next phase of the Housing element update and there will be a second community workshop focused on looking at potential housing sites.*

5. What is the City's plan to accommodate parking for the proposed housing?

Staff Response:

- *Parking will be looked at through development standards in the new Specific Plans. The City is looking at ways to accommodate parking through efficient parking management and best practices for infill and mixed-use projects.*
- *Parking standards will depend on the type of project. For example, density bonus projects are eligible for reduced parking requirements under State law.*

6. How can we be sure that new housing units will contribute towards meeting the City's housing needs, in other words, house permanent residents of the City and not function as short-term

rentals for travelers. ADUs in particular can be rented out as short-term rentals to generate income for the owners.

Staff Response:

- *The City is looking at Short Term Rental (STR) regulations. The intent of the STR regulation is to document existing STR units in the City, and ensure that ADUs are not being used as STRs.*
- *ADUs are actual dwelling units and are meant for long term residence. Per Code, ADUs cannot be rented out for less than 30 days. Additionally, City Council is looking at increasing the minimum number of days for renting ADUs to 90 days. If people are using their ADUs for short term rentals, they are doing so illegally.*

7. Does the Housing Element provide detail regarding how housing will be created under the lower and moderate income categories? Can you provide any updates regarding the old Ikea site, how many residential units are you considering to build on that site, and how will it be classified under each income category? Is the 34-acre property you are referring to the entire Mall?

Staff Response:

- *Housing Element statutes allow for the use of default densities to assign sites to the various income categories. For Burbank, any site with a density of 30 units/acre or greater can be credited towards its low and very low-income RHNA need, and sites with 12 units/acre and above are considered suitable for development of moderate income housing. While a 30 unit/acre market rate project may not be affordable to lower income households, the City is setting the stage through zoning to allow a developer – typically a non-profit - to build affordable housing at that density.*
- *The City is also in the process of updating its Inclusionary Zoning Ordinance that requires a certain percentage of deed restricted affordable units to be built within projects that have 10 units or more.*
- *In addition, the State has allocated significant funding to support production of affordable housing.*
- *Regarding the old IKEA site – there was a mixed-use project proposed – Burbank Town Center North – that proposed over 1,000 units. Due to COVID, the Mall has been shut down and property owners are re-evaluating the feasibility of repurposing the Mall. The 34-acre Ikea site is inclusive of the entire Mall proper, including development across and adjacent to the freeway, In-N-Out, and furniture stores.*

8. It will be interesting to look at the correlation between Burbank’s disadvantaged communities/high impact areas and the location of entertainment industries that have a rate of high employment turn-over. For example, the Media Center is located in an area identified as a disadvantaged community.

Staff Response:

- *Good feedback – Burbank is unique as it has prominent media industry presence. Such feedbacks are important for policy development to mitigate negative impacts.*

9. How much contribution do large companies - like Netflix and Disney that are employers in the City - have in providing housing for their employees? Microsoft and Facebook are examples of large companies that have contributed towards housing for their employee in the past.

Staff Response:

- *We aren't aware of anything specific where Burbank employers are providing housing assistance, but we will check with the Economic Development Department to get more information. These big companies are usually supportive of opportunities to facilitate housing near and around their employment site, and employees have expressed an interest in residing close to their workplace.*
- *For the Housing Element survey, we have included questions about potential new housing programs for Burbank, including a potential Commercial Impact Fee that requires new commercial developments to pay a fee which contributes towards City's affordable housing trust fund to provide affordable units.*
- *Other efforts being undertaken by the City include evaluating Development Impact Fees to identify opportunities for new developments to provide their fair share of funding for community services and infrastructure including new housing units.*

10. How will the increase in housing units impact schools in the City? What will be the impact on those people who work in the City but don't live here and want their kids to join schools here?

Staff Response:

- *The Environmental Impact Report (EIR) for the Housing Element Update will include an assessment of schools. During the process, we talk to schools and see how they are projecting their growth, and we look at the impact of potential growth from housing on the schools.*
- *The 4City will reach out to BUSD and their demographers regarding Housing Element Update to verify enrollment rates and their capacity.*

11. Will there be any consideration for the impact the increase in housing will have on early child care and education/ infant care (age 0 to 5 years)? Gaps in infant care hit crisis levels in 2018 in Burbank and had a direct impact on economic participation by the parents. In workforce housing – young adults (25-44 years) upon beginning a family – Infant care becomes their first introduction to the neighborhood. I urge the City to consider infant care, child care, and early education in this Housing Element Update.

Staff Response:

- *Good point. Traditionally the environmental assessment doesn't specifically evaluate early childcare, but we can take this into consideration.*
- *There are various avenues that can the City can use (including CEQA review) to address infant care, child care, and early education.*

12. With respect to ADUs – there were 350 permits submitted for ADUs. How many of those permits are for new ADUs? How many of these permits are for those ADUs that are being legalized by bringing them to conform to the Burbank Municipal Code? Where are new ADUs being built?

Staff Response:

- *The City has few cases of existing ADUs that are being legalized. The vast majority of ADUs fall into two categories –*
 1. *Garage/accessory structure conversion*
 2. *New detached ADUs*
- *In terms of where new ADUs are being built, the City has created a map showing the distribution of ADU applications throughout the City. The map was included in a November 10, 2020 ADU update to the City Council and can be access at the following link:
https://burbank.granicus.com/MetaViewer.php?view_id=42&clip_id=9251&meta_id=376295
The map indicates that ADU development has been dispersed throughout the City.*

13. Talking about employer assisted housing, especially given the current situation where people are working remotely due to COVID, and given that post COVID there may not be as much demand to commute, there might be an opportunity to provide on-campus housing within commercial properties for short term workers who work in the City on a project basis (may be for a year). This might help to ease the pressure on the smaller units that can provide housing for permanent residents. Is this something that larger commercial entities can consider?

Staff Response:

- *These are good points. We need to set up future discussions with large employers to see where they stand on this matter.*

14. With such a large proportion of young professionals in Burbank, many of whom live alone, what happens when they start families - do they leave Burbank or are they able to start families here? Similarly, a large number of young professionals live with their parents due to high housing costs – are there any efforts underway or planned to help this age group?

Staff Response:

- *The City's goal is to significantly increase the production of housing for its workforce, and through this increase in supply, pent up demand will be reduced and housing prices should come down. The City will employ a variety of tools - including inclusionary zoning, density bonuses and other affordable housing incentives - to ensure a portion of new housing is provided at levels affordable to lower and moderate income households.*
- *Accessory dwelling units (ADUs) can also provide a less costly housing option for young professionals, and with over 540 ADU applications received over the last three years, ADUs are becoming more widely available throughout Burbank.*

15. Has there been any thought to evaluating the long-term effects of COVID 19 on the workforce needing to be near their work vs working from home?

Staff Response:

- *While there is likely to be reduced demand for commercial office space moving forward, Burbank's employment base continues to grow (refer to response to Question #1). The City has over-produced jobs relative to housing for several decades, resulting in a ratio of three jobs for every housing unit. Even with reduced demand for office, the City needs to increase housing production to achieve a healthy jobs/housing balance.*

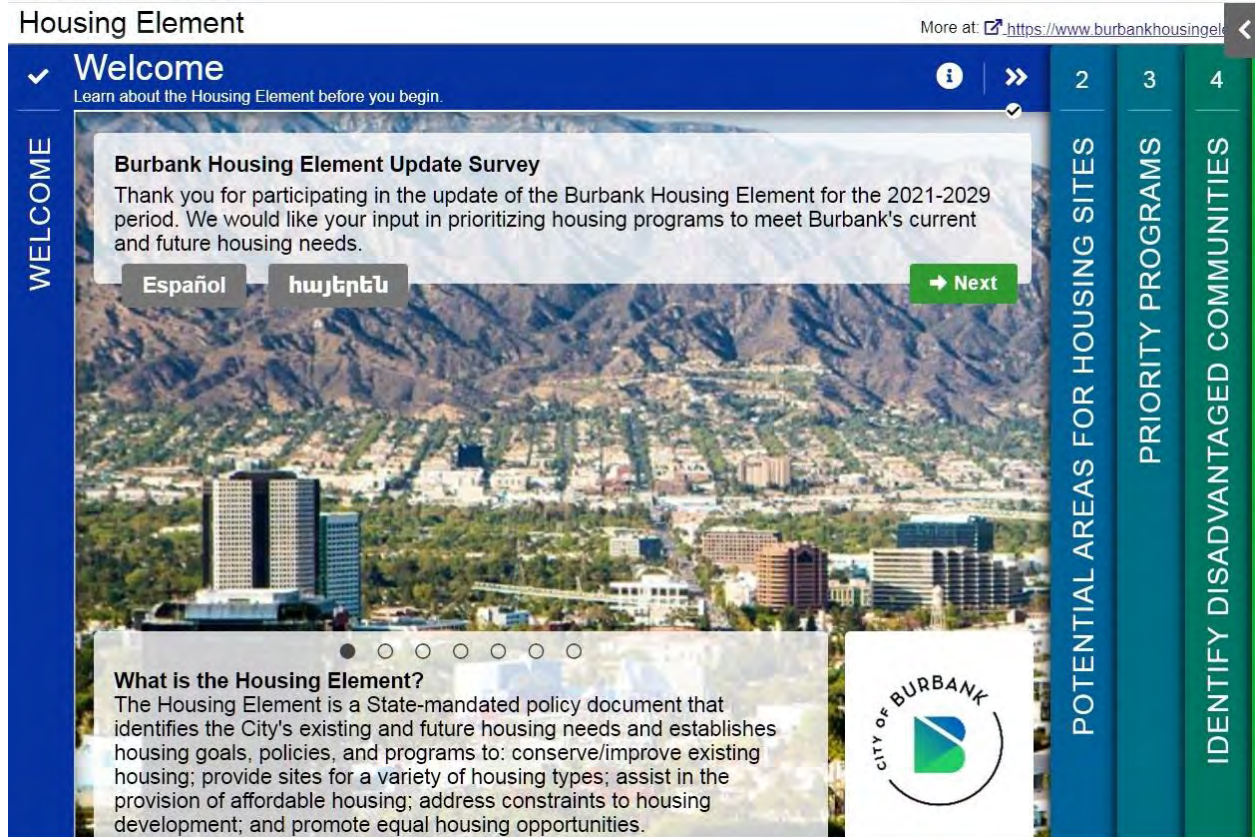
16. I'm wondering about traffic issues, particularly Barham Boulevard as it is already congested. What is being done to alleviate that kind of additional strain on the roadways?

Staff Response:

- *Burbank's General Plan - adopted in 2013 - studied how growth in the City between 2010 and 2035 would impact its street system, and included land use changes, transportation policies, and six targeted intersection improvements to lessen impacts to transportation. The Housing Element will build on the General Plan analysis to identify how the amount and location of new housing will affect transportation. The Housing Element will study if building new housing in Burbank, near jobs and transit, will reduce the number and length of car trips in the City because more housing provides opportunity for Burbank workers to live closer to where they work.*
- *The cause of congestion on major roads leading into and out of the City, such as Barham Blvd, is because most of the employees who work in Burbank live elsewhere and must commute into the City. Adding new housing in the City will likely lessen traffic increases on Barham and other regional corridors.*
- *The General Plan and the Housing Element do not propose major street and road improvements to reduce congestion because widening streets increases car trips and harmful environmental effects like greenhouse gas emissions.*

Appendix F-4: Housing Element Online Survey

The online Housing Element survey was administered through MetroQuest. It was available in three languages (English, Spanish, and Armenian) from September 30, 2020 to January 4, 2021.



Appendix F-5: Housing Element Survey Results

Online Survey

English: September 30, 2020 to January 4, 2021

Spanish: November 19, 2020 to January 4, 2021

Armenian: November 19, 2020 to January 4, 2021

Characteristics of Survey Participants

Participants by Language of Survey	Renter/Owner	Housing Type	Demographics	HH Income
English: 224	Renter: 40%	SF Detached: 57%	White: 60%	Under \$50,000: 22%
Spanish: 1	Owner: 54%	Duplex: 4%	Hispanic: 12%	\$50,000-\$74,999: 18%
Armenian: 2	Other: 6%	ADU: 3%	Black: 5%	\$75,000-\$99,999: 16%
		Apartment: 28%	Asian: 6%	\$100,000 and over: 44%
		Condo: 6%	Other: 17%	
		Care Facility/Assist: 1%	Under 25 yrs: 3%	
		Other: 2%	25-39 yrs: 22%	
			40-45 yrs: 44%	
			55-69 yrs: 24%	
			70 yrs over: 7%	

Potential Areas for Housing Sites (Areas ranked by survey participants)

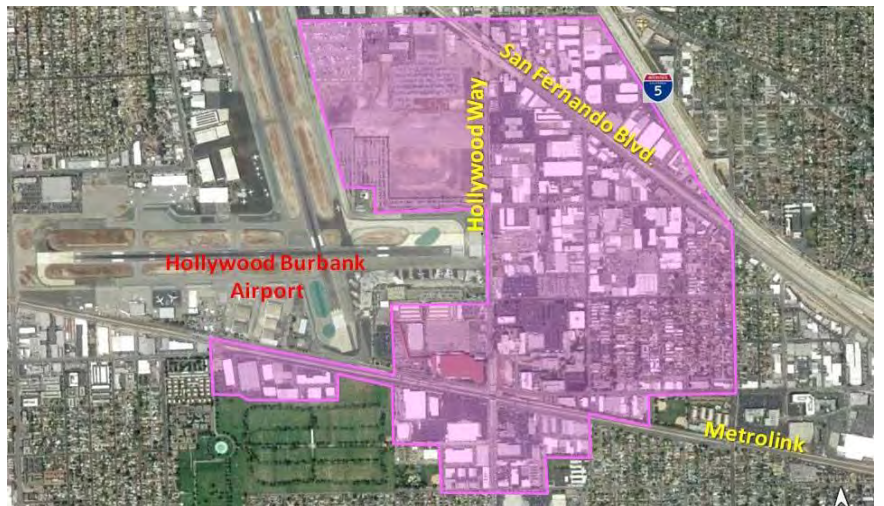
1. Downtown Burbank - Metrolink Station



2. Downtown Burbank - North San Fernando



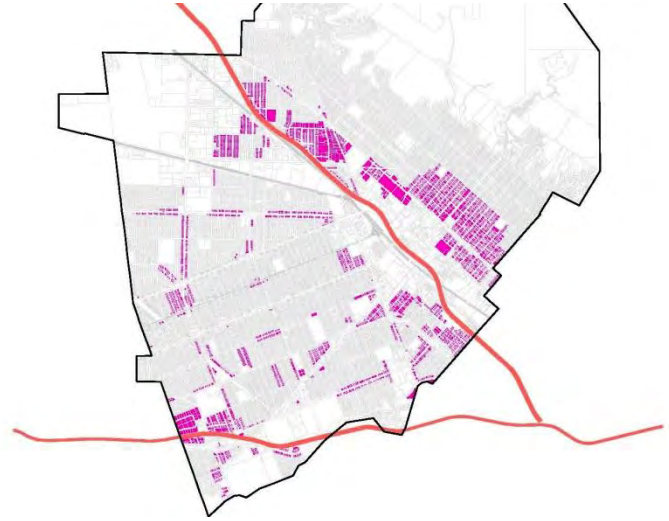
3. Golden State/Airport District Area



4. Media District



5. Multi-Family Neighborhoods



Other Housing Sites Suggested by Survey Participants:

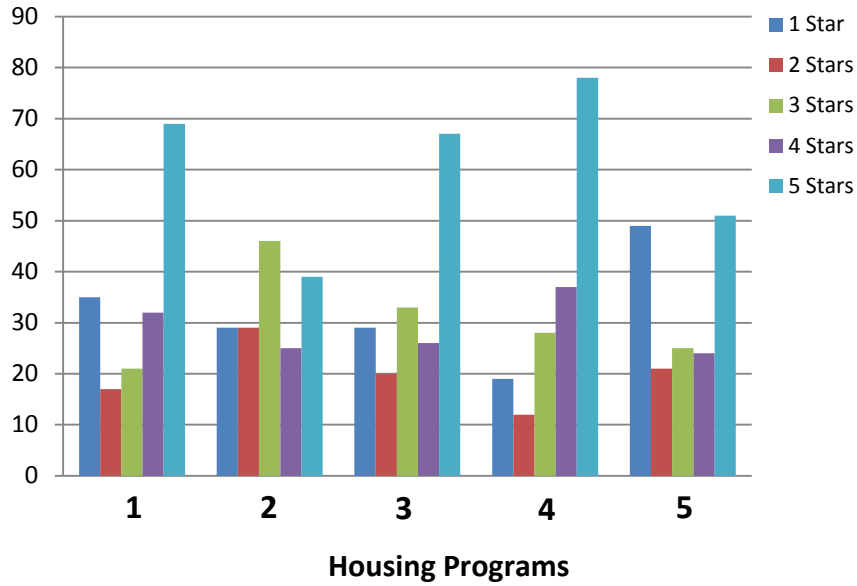
- Consider remodels of existing commercial space, to include residential capacity.
- While the current multi-family zones should be an area of focus for more to-buy multi-family development (condos, townhouses, and duplexes), existing single-family areas should be rezoned to allow denser housing.
- Former retail, like old IKEA that can become mixed use. The Americana concept is very appealing. All focus should include units for purchase above all other concerns. Having an ownership stake ties residents to the City in a more meaningful way.
- The old City dump above Belair.
- Empire between Buena Vista and Hollywood Way. Vanoven Blvd between Hollywood Way and Clybourne.
- That HUGE and forever unused lot by the 5 fwy and Burbank Blvd, where circuses set up. Use it for something useful already!!!
- Stay far from the Downtown/Media area. No more new buildings and NO additional traffic!! Obviously don't add to any area that has traffic right now. Don't make any area worse. Use units on Burbank Blvd or Victory at the No Ho border. It's dead over there so a bit more traffic won't be worse.
- Multi family or mixed use housing would be beneficial along the bike path and the 5 fwy for example the end of the block at Lamer St
- I would love to see more multi-family housing built in single-family housing neighborhoods (similar to parts of the Media District). It would help space out housing density and traffic congestion.
- Rancho District.
- West Burbank, Northern Burbank and undeveloped areas around Olive and Burbank Blvd.

Comments for no additional housing:

- Nowhere, water, electricity, infrastructure should not be built in Burbank!
- Not in Burbank. Too much traffic as it is. Stop taking government money. Enough people now
- No new housing
- None. We have enough. Let's take better care of what we have. This city has sadly gone downhill in the 25 years I've been here. I've never seen so much trash on the streets as I do now and our roads and trees have never been this neglected before. The traffic is horrendous. More housing and increasing our population in this already cramped city should not be our focus. Improving what we have should be the greater good.
- Nowhere. Don't give in to the State's tyrannical mandates.

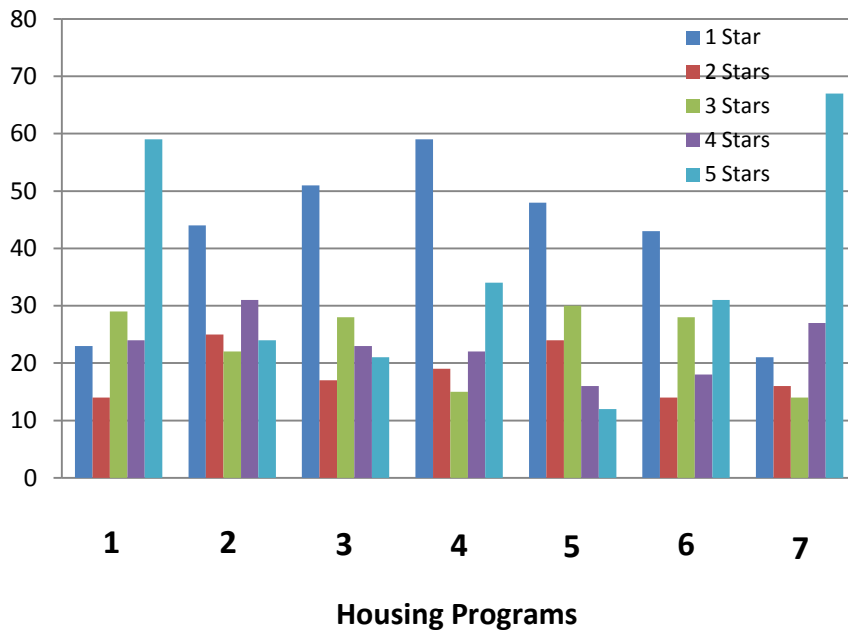
Priority Housing Programs

Stabilizing Neighborhoods

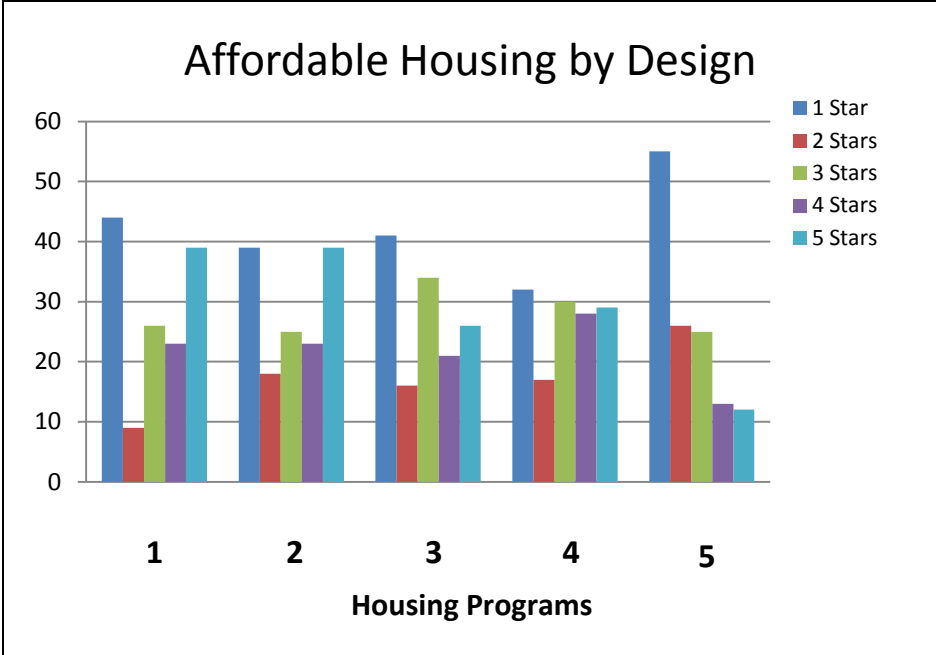


Ratings on Housing Programs (Weighted Average)	# Stars
1. Acquisition/Rehab. of Apartments with Affordability Controls	3.5
2. Homeowner Rehab. Asst.	3.1
3. First-Time Homebuyer Asst.	3.5
4. Local Preference for Burbank Residents and Employees	3.8
5. Tenant Protection Asst.	3.1

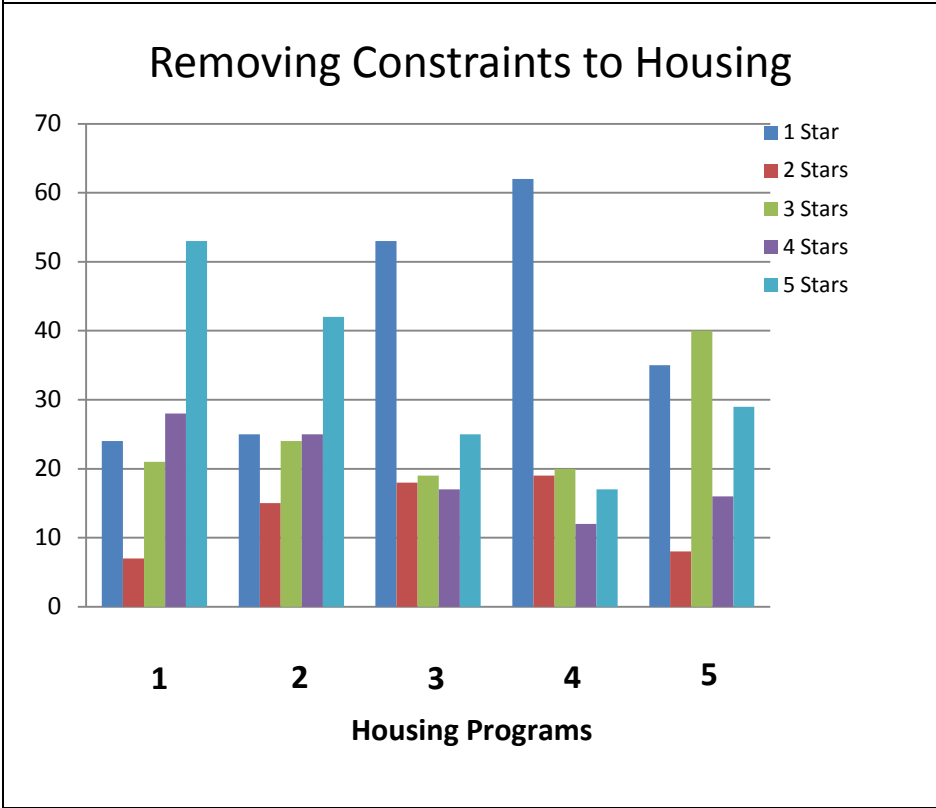
Planning for Production



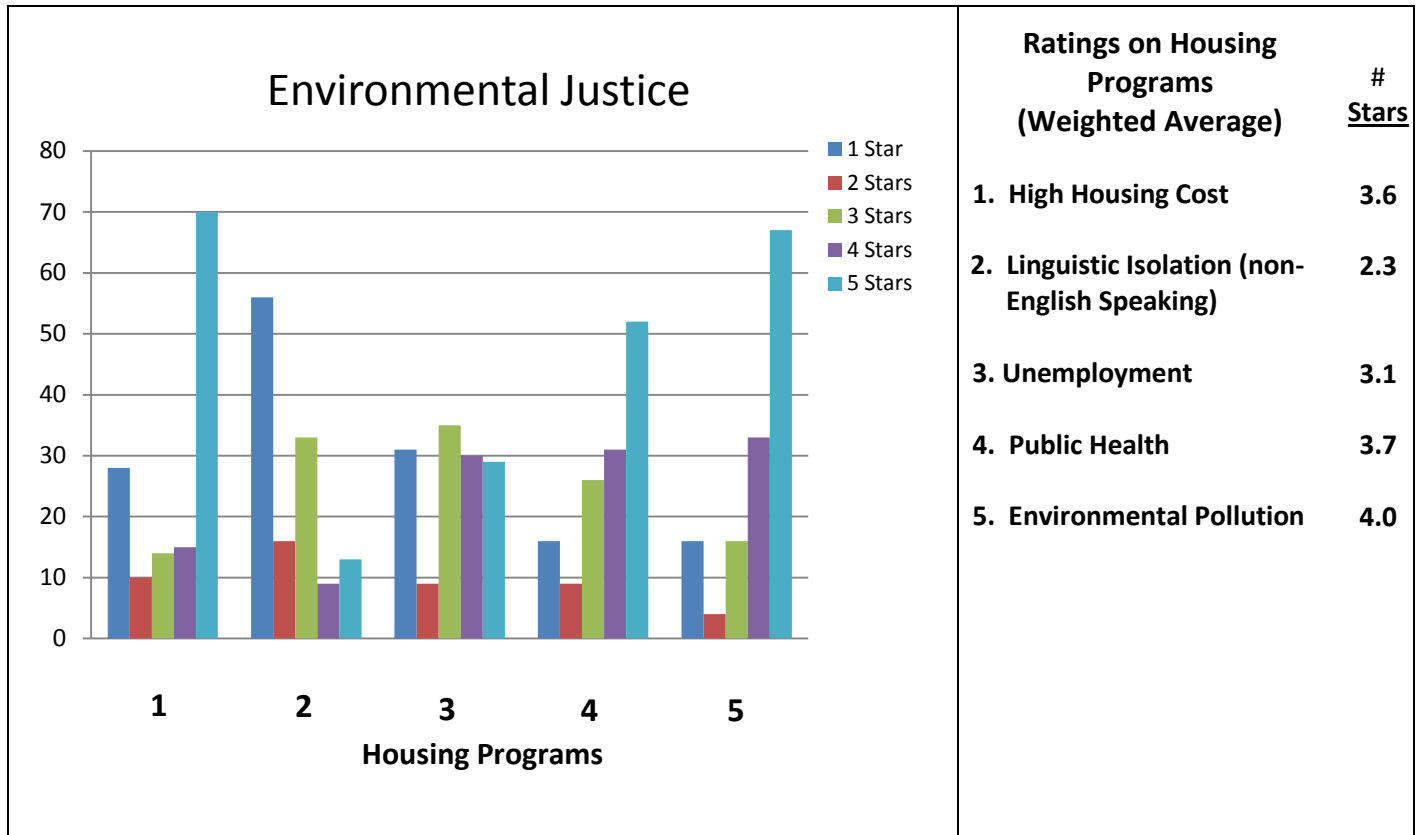
Ratings on Housing Programs (Weighted Average)	# Stars
1. Increase Density Near Transit	3.6
2. Increase Density in Multi-Family Zoned Neighborhoods	2.8
3. Establish Minimum Residential Densities	2.7
4. Allow 1-2 Additional Units on Single-Family Lots	2.7
5. Inclusionary Zoning and In-Lieu Fees	2.4
6. Commercial Linkage Fees for Affordable Housing	2.9
7. Affordable Housing on Surplus Public Land	3.7



Ratings on Housing Programs (Weighted Average)	# Stars
1. Incentives for ADUs	3.1
2. Tiny Homes/Micro Units	3.0
3. Manufactured Housing	2.8
4. Motel Conversions	3.0
5. Single Room Occupancy	2.3



Ratings on Housing Programs (Weighted Average)	# Stars
1. Streamline/Expedite Housing Development Approval Process	3.6
2. Reduce Development Fees in Exchange for Affordable Units	3.3
3. Increase Residential Densities	2.6
4. Reduce Multi-Family Parking Requirements	2.3
5. Modify Residential and Mixed-Use Development Standards	3.0



Other Programs Suggested by Survey Participants:

Stabilizing Neighborhoods

- Burbank is a desirable neighborhood to live because it is one of the only safe cities in the Valley for families to live with a great public school system. The reason for that is that most people who live here are in single-family homes. The City should not put money towards something which negates its value proposition. People who need to live in apartments have several options nearby, but not here.
- I walk the neighborhoods surrounding the Chandler bike path and see many homes that look in very poor condition. Possibly they are owned by long-term elderly residents. I don't know. But helping elderly homeowners keep up their property would benefit them and future buyers.
- Is this a form of City run low-income buildings? I have an open mind to it but would want successful examples to model.
- Low & extremely low income units are needed not the so called affordable units.
- The only assistance that's needed for first time home buyers is to either completely ban or at least more heavily regulate flipping. House flipping in Burbank is out of control and prices so many young buyers out of the market entirely.
- We had no help to buy our 1st house not even from family. Nothing and we still did it. Had to start small with a condo. Sell, buy bigger with your equity.
- There are current programs already, including programs to help with down payments.
- Help younger folks and people of color who are new to homebuying.
- What is homeowner rehabilitation assistance?
- For energy, green space and conservation.
- And for building ADU.
- Yes, for homeowners. Not for employees - no guarantee how long they will work in Burbank. They may simply get the help and change to a job in LA. I received NO preference when we bought our house and I worked at Disney here for 30 years! Still bought my Burbank house no preferences given.

- Reduces traffic and commute times which impact the traffic congestion and environmental impact in our city.
- Yes, only use already built apartments. NO NEW DEVELOPMENT.

Planning For Production

- Assist homeowners who are struggling to pay their mortgage and single young people who may not be able to afford a one-bedroom apartment in Burbank.
- Yes. much more of this.
- I can't find a description of what this means, but if it has to do with increasing the number of residents allowed in an area, then I'm all for it.
- We need more affordable housing, but not at the cost of what little open land that's left.
- Without consideration for cars and access, over crowded streets will get worse.
- Again, it's single-family or not. If we wanted lots of transient living or neighbors who have no skin in the game, we'd have chosen elsewhere. I grew up in a single-family neighborhood without too much traffic or cars parked everywhere. It is better, and we will make sure our children are raised the same way. It seems like that may be outside of California.
- Strongly disagree turning single-family lots to condos, apartment buildings or duplex or triplex. No additional construction on 91504 above Glenoaks.
- This will only cause more traffic and less social distancing. We don't have the infrastructure to support more people on R1 and especially R1H zoned lots.
- Unless the in-lieu fees are calculated fairly for real life affordability, this will not benefit actual affordable housing. I suggest you read this info here and made contact them for assistance <https://inclusionaryhousing.org/designing-a-policy/off-site-development/in-lieu-fees/setting-the-in-lieu-fee/>
- Dump the in-lieu fees part of the plan. it's just an attempt to push people deemed undesirable by a neighborhood into housing that is separate from the rest of the population. if you want to build in our city, providing low income housing in your project should be mandatory
- We are exploring exiting not only Burbank, but possibly California over this issue. Single-family property and neighborhoods are only the acceptable choice for our family. We will not allow our positive tax contributions to fund pensions and programs that remove our freedom to choose this form of housing. Anywhere without single-family housing is not a place we will live or send our children to school. We'll lose money escaping if we mistakenly chose Burbank for single-family.
- ABSOLUTELY NOT!! Burbank is one of the few areas in LA that retains a suburban neighborhood feel. That's one of the main reasons people choose to live here. If you take that away, you will see all existing residents' property values plummet. And for what? To solve the California housing shortage? While that's important, there's PLENTY of land in other cities. There's also the Inland Empire as a more affordable option
- It's important to keep R1 and R1H zoned homes as single-family living.
- Density is already overflowing. Parking is a nightmare on almost every street
- ABSOLUTELY NOT!!!
- Yes! This needs to happen to help reduce emissions.
- The recent proposed development and the prices they were proposing as affordable to work and live near transit in Burbank made no affordable sense unless the retail jobs paid \$20 p/h and the developers agreed to make more than a handful of units "affordable" by L.A. minimum wage standards. Plus living next to transit hubs with the bad air pollution L.A. already has is not a healthy solution to housing needs.

Affordable Housing By Design

- Motels are a dying model and could be a low income housing option.
- This only works for the many people who would benefit from this low price rent if the buildings are actually maintained & safe for tenants, and if the building owners are given additional financial assistance so they aren't tempted/forced to raise rents, evict to convert to condos, or sell to developers.
- This would greatly help the many families who were already struggling to pay their mortgages before the covid19 pandemic to potentially make extra income using an ADU or Tiny Home as a rental on their property. Alternately they could help their family members or friends with housing if they had lost theirs. Also providing financial incentives for

more eco-friendly ADUs and Tiny Homes would be an additional help positively affecting the environment, housing, and economy.

- None of these suggested programs will work for families- they are all about housing that will fit single people or perhaps couples. Affordable housing with enough space for a family is impossible to come by in Burbank and needs to be addressed. I have yet to see a plan from the City that does so. \$3-4 k per month in rent/mortgage is not affordable.
- R1H zoned areas are already crowded and we need to preserve them.
- Same answer as before. Single-family is best, from firsthand experience. This would end that and the extent that it exists now is too much. But we can probably pack in like 3 families on our lot, so it might be a good selling point to help get us to a state where people are free to set the rules for their neighborhoods and each home is owned by the occupants. Media industry isn't bound to So Cal anymore, which also helps.
- Mobile homes (aka manufactured housing) are a scam because you only own the home, NOT the land underneath it. If you owned both that would make more sense, otherwise it will never be a viable affordable housing solution.

Removing Constraints to Housing

- Having preapproved style plans for houses, complexes and ADUs.
- Increase the size for ADU, have preapproved plans.
- Shopping areas like Magnolia should have 1-2 stories of housing above them.
- Having senior services in a building housing seniors, pharmacy, doctors office etc. childcare business at large housing projects, grocery store at transit to reduce car needs. Japan as a model.
- This only works if the number of affordable housing units required in any new development are at minimum 50-60% of the development.
- If anyone wanted high density they would have gone there, choosing this option is directly in opposition to why people came here. You will drive people like us away. Our tax contribution to the pension fund is not small. Though paid enough, most of senior staff does not choose Burbank as their own home, and quality of life for single- family owners doesn't their paychecks, so why not? As long as the paycheck comes, it doesn't affect their day to day lives. Density goes up, Burbank goes down.
- Do not increase density.
- If you are serious about climate change, shouldn't we be planning for less vehicles and more green space?
- It depends on what those modifications and standards are.
- Do not modify R1 and especially R1H zones.
- Must remove the loop holes and conflicts of interest for elected officials.
- No way, Burbank fees need to be at the same levels as Glendale & Pasadena.
- Streets are often impassable due to cars double parked.
- No - too many areas already have parking issues.
- Increase them! Get cars off the street and underground!! Only in California are cars allowed to ruin our streets.
- Needs more thought by everyone who ever tried to park east of Glenoaks Blvd!!!!!! Don't make the problem worse with reduced requirements.
- As it is, homes are built out of code. This would be even worse. However, raising fees for corrections and resubmitting would be more effective at streamlining poor workmanship by designers posing as architects and other nefarious practices trying to sneak non conforming structural elements past plan checks.

Environmental Justice

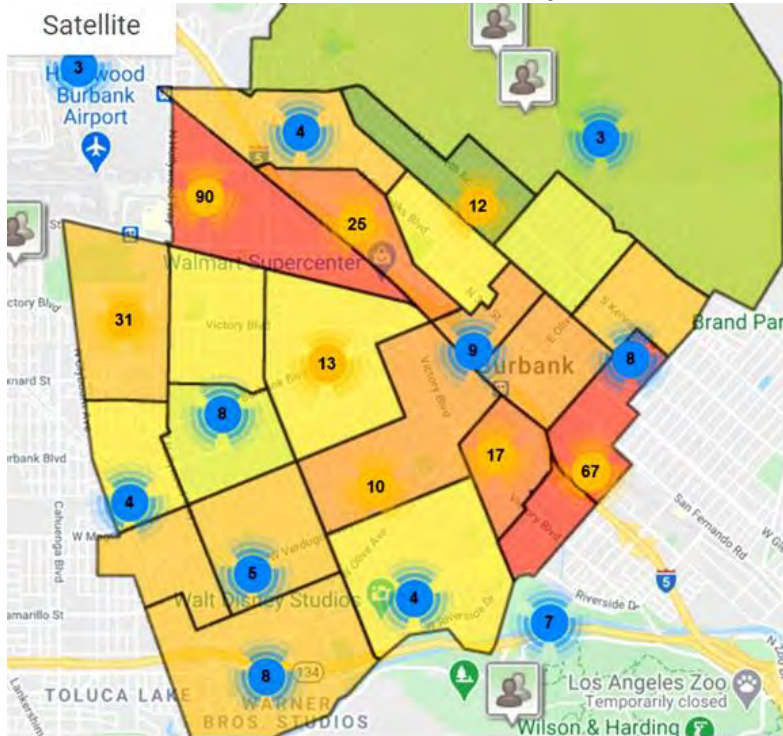
- English as a Second language needs to be encouraged with easy access to classes formal or informal that is fun and inclusive.
- Is this for or against? I am pro diversity and think English speaking should not matter.
- "Justice" in this sense is used amorphously in many cases like the other popular buzz words of the day and is frequently an opinion. But certainly helping people become employed would help their housing costs.
- Mentoring programs are needed. Internships. Trade schools (plumbing, electrical, construction). Gone are the days high school kids could get jobs at restaurants as those are now filled by adults.

- With Covid we can only prevent fraud and train younger people for the trades. Electrical, plumbers, framers etc.
- Dental for the young and elderly is highly overlooked.
- Housing cost is too high and condo, townhomes, ownership needs to be priority. City owned property needs to be used for low income housing that doesn't expire.
- The cost of rent and home purchase is extremely high in Burbank in comparison to the local neighboring communities.

Identify Disadvantaged Communities

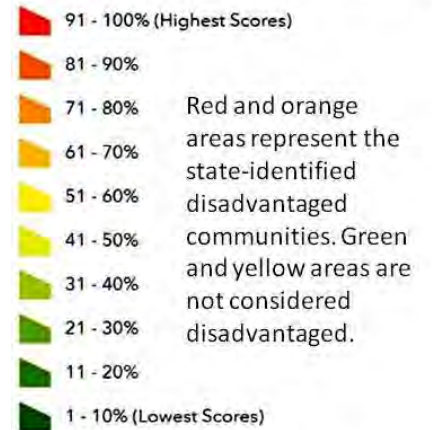
(A map of the State's identified disadvantaged communities was included in the survey. Participants were asked to identify where they thought disadvantaged communities were in the City)

Identified Disadvantaged Communities
(Numbers in the circles indicate votes for the area)

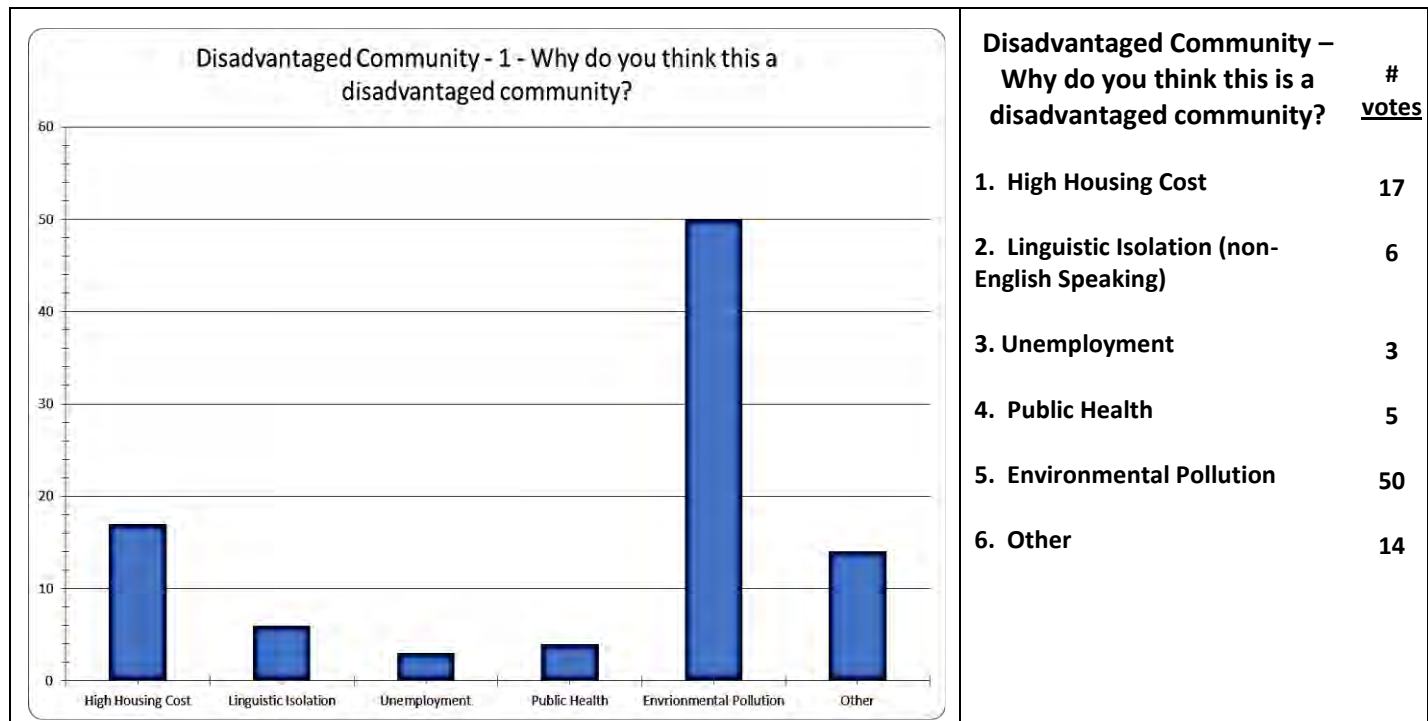


Majority of survey participants agreed with the State's identified disadvantaged communities by voting for the areas that matched the State's designation.

Disadvantaged Communities



Source: CalEnviroScreen 3.0 Results (June 2018 Update)



Other Reasons Suggested by Survey Respondents:

- Nearby train tracks and airport. Affected by both air and noise pollution.
- Close to the busy I-5 freeway, noise and air pollution.
- Freeway noise and traffic congestion due to Empire Center development.
- Noise pollution- airport.
- Close to freeways, less desirable part of the City, more distant access to City amenities.
- This area is sparse in terms of consumer facing businesses, mainly warehouses. This area likely has a lot of noise pollution due to proximity to airport.
- Airport adjacent.
- Airport
- Exposed to airport noise.
- Too adjacent to airport flight path. Buildings that should be affordable now owned by landlords who expect top dollar for very old, out of date units.
- Adjacent to industrial sites.
- Pollution from airport AND train proximity, and high housing costs.
- A surfeit of auto body shops, abandoned businesses, dumping zones and unkempt streets contribute to a deteriorating community area.
- So close to Victory, I-5 and the metro tracks. High traffic volume from people that don't live in Burbank
- So close to N. Hollywood subject to traffic that is "Cutting through" Burbank and is often unlawful
- Condition of properties and age of apartment buildings
- Apartments a little rundown
- Multi family dwelling could use some redevelopment
- This area looks very neglected. I see many apartments very populated.
- High density.
- High housing cost, increased crime, no useful police help.
- And high housing cost.
- This area is extremely unaffordable

- The lack of commerce, accessibility, and increased traffic in this housing area.
- "Traffic pollution from freeway
- The high cost of housing in this area is not commensurate with the wages and high turnover rate of jobs in the area. Property owners take advantage of the desperation and competitiveness of the workers in the area.
- Rent prices have skyrocketed around Magnolia Park driving out residents.
- Overcrowded and subpar housing.
- There are areas in NoHo that look run down. I'm assuming they can't afford up keep.
- Reports of crimes
- Overcrowding and high crime.
- Trash, shopping carts on the sidewalk, junk cars, loud music from apartments
- A lot of homeless near the park.
- Homelessness
- Homeless encampment at Olive and Beachwood, homeless mess in front of store on Verdugo across from McDonalds
- Space to build in this area, also closer to transit and City center.
- Ignored opportunities for development
- Very poorly planned parking that remains a constant problem and adds to environmental pollution as residents & guests drive around the neighborhood for 15-30 minutes looking for a place to park.
- Lousy public transportation
- How about planting more trees in this area?"
- Poverty
- City is considering programs that will tarnish the very reason that so many good people choose to live here: Single-family homes, a suburban community feel, and a great school system
- The area around Magnolia Park, especially between Chandler and the 134, are far from "disadvantaged", yet are marked as orange. Way off. Some of those neighborhoods are highly advantaged, luxury etc

Appendix F-6: Comment Letters on Draft Housing Element

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

2020 W. El Camino Avenue, Suite 500
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August 17, 2021

Patrick Prescott
Community Development Director
City of Burbank
150 N. Third St.
Burbank, CA 91502

Dear Patrick Prescott:

RE: Review of the City of Burbank's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Burbank's (City) draft housing element received for review on June 18, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a telephone conversation on August 10, 2021 with Assistant Community Development Director Federico Ramirez, Deputy City Planner Scott Plambaek, Senior Planner Lisa Frank, and the City's consultant Karen Warner and team. In addition, HCD considered comments from Abundant Housing LA and Josh Albrektson pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit HCD's website at: http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that

represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

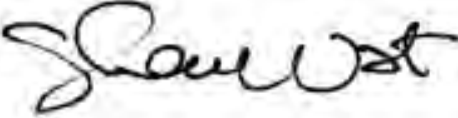
Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

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

HCD appreciates the cooperation and dedication the City planning staff, and Karen Warner provided during the course of our review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Divya Ram, of our staff, at Divya.Ram@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West", is written over a light gray rectangular background.

Shannan West
Land Use & Planning Unit Chief

Enclosure

APPENDIX CITY OF BURBANK

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the evaluation of programs in the past cycle, the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing (AFFH) in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

Integration and Segregation: The element includes limited local and regional data on integration and segregation of race, and no local and regional data on disability, familial status, and income. For example, while the element includes data on race, it does not include data and analysis on disability, familial status, and income. The element needs to include complete local and regional data on integration and segregation for the City and analyze it for both local and regional trends and patterns.

Racial/Ethnic Concentrated Areas of Poverty (R/ECAP): The element includes some data on R/ECAP but no data or analysis areas of affluence. The element needs to be revised to include local and regional data on areas of affluence and analyze this data for trends and patterns. The element should also provide an updated map and analysis on racial and ethnic distribution and poverty (page B-9).

Access to Opportunity: The element includes limited local data on access to opportunity of education, economic, transportation, and environment, and no regional

data on access to any of these opportunity areas. However, a complete analysis should include an analysis of disparities in relation to education, economic opportunity, transportation, and environmental factors at the regional level.

Disproportionate Housing Needs including Displacement Risks: The element includes some local and regional data on cost-burdened households, overcrowding, and substandard housing, homelessness, and limited discussion on displacement issues but does not include regional analysis on substandard housing and homelessness. The element should include a complete regional data for substandard housing and homelessness and analyze the data for trends and patterns. The element should also contain a more complete discussion and analysis of displacement risks. Please refer to page 40 of the AFFH guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidancev>) for specific factors that should be considered when analyzing disproportionate housing needs and displacement risks.

Sites: The element includes a map of the site inventory and states that the proposed sites to meet lower-income regional housing needs allocation (RHNA) are geographically distributed which results in these sites AFFH (page C-2). However, the accompanying analysis shall also be reflective of housing development at all income-levels and evaluate the sites relative to socio-economic patterns. The site inventory analysis should address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group and should be supported by local data and knowledge.

Goals, Priorities, Metrics, and Milestones: Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. Actions must also:

- Address significant disparities in housing needs and in access to opportunity.
- Replace segregated living patterns with truly integrated and balanced living patterns.
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

Currently, the element identifies several programs to address fair housing issues. However, to facilitate meaningful change and address AFFH requirements, the element will need to add or revise/expand programs to demonstrate how it addresses fair housing issues.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

While the element quantifies existing and projected extremely low-income (ELI) households, it must also analyze their housing needs. The analysis of ELI housing needs could consider tenure and rates of overcrowding and overpayment. To assist the analysis,

see the enclosed data and sample analysis at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

The element identifies the age of the housing stock (page 1-28). However, it must include analysis of the condition of the existing housing stock and estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a RHNA of 8,772 housing units, of which 3,971 are for lower-income households. To address this need, the element relies on pending and entitled residential projects, specific plans, and accessory dwelling units (ADUs). To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Progress in Meeting the RHNA: The element indicates (page 1-68) that 116 units affordable to very low-income households and 27 units affordable to low-income household have been built or are under construction or approved, but the element provides no information documenting how affordability of the units was determined. As you know, the City's RHNA may be reduced by the number of new units built since June 30, 2021; however, the element must describe the City's methodology for assigning these units to the various income groups based on actual sales price or rent level of the units and demonstrate their availability in the planning period. (Gov. Code, § 65583.1, subd. (d).) For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/projected-housing-needs.shtml>.

Realistic Capacity: While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and

accessibility of sufficient water, sewer, and dry utilities. The element also needs to analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of nonresidential development, performance standards, and development trends supporting residential development. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#zoning>.

Small Sites: The site inventory identifies small sites to accommodate the City's lower-income RHNA. Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element should provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation, such as common ownership. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City's lower-income housing need. Based on a complete analysis, the City should consider adding or revising programs to include incentives for facilitating development on small sites.

Suitability of Nonvacant Sites and Candidate Sites for Rezoning: The element identifies a large portion of its RHNA at all income levels on nonvacant sites including sites that will be rezoned to address the 6th cycle shortfall (page 1-66). The analysis mentioned a list of factors that were considered to determine development potential including age of structures and degree of underutilization. However, the element must include a complete analysis demonstrating the potential for redevelopment of nonvacant sites including the extent to which existing uses may constitute an impediment to additional residential development. The element could include the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

In addition, the element should clearly identify the degree of reliance on nonvacant sites to accommodate the housing need for lower-income households. Please be aware that relying on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.

Specific Plans: The housing element relies upon specific plan areas, including the Golden State Specific Plan (GSSP) to accommodate 6,153 units of the City's RHNA including for lower-income households (pages 1-46 and 1-66). While the housing element indicates the GSSP's residential capacity and estimates the number of units

by income group, the element should also describe factors that that will lead to residential development of these specific plan areas. For example the element should describe required development standards, whether 100-percent residential development is allowed, necessary approvals or steps for entitlements for new development (e.g., design review, site plan review, etc.), and development agreements, and conditions or requirements such as phasing or timing requirements, that impact development in the planning period.

Accessory Dwelling Units (ADUs): The element assumes an ADU buildout of 200 ADUs per year for a potential buildout of 1,600 units within the planning period. Given that the City has permitted 54 ADUs in 2018, 110 in 2019, 97 in 2020, and 179 in the first 6 months of 2021 (for an average of 98 units per year), it is not clear if a production level of 200 ADUs per year will be achievable over the planning period. As a result, the element should be updated to include a realistic estimate of potential ADU production. Depending on the analysis, the element must commit to monitor ADU production throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element. In addition to monitoring production, this program should also monitor affordability. Additional actions, if necessary, should be taken in a timely manner (e.g., within 6 months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

Infrastructure: While the element identifies sufficient existing or planned water and sewer, it does not include availability and access to dry utilities. The element must add availability and access to dry utilities to accommodate the City's regional housing needs for the planning period. (Gov. Code, § 65583.2, subd. (b).) For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental>.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (a)(5).)*

Local Ordinances: The City's Growth Management Ordinance includes information on its purpose and analysis on constraints (page 1-49). However, the analysis should include the current number of units vs. units built out considering the RHNA. Furthermore, the element notes "the maximum allowed number of residential units beyond the approved maximum build out in the 1988 Land Use Element without voter approval" and that City Council extended Measure 1 to January 1, 2030. The Housing Crisis Act of 2019 (SB 330, 2019) was signed by Governor Newsom on October 9, 2019 and became effective on January 1, 2020. The Housing Crisis Act (Gov. Code, § 66300) generally prohibits a locality from enacting a development policy, standard or condition that reduces intensity, imposes moratoriums, enforces subjective design standards, or implements any provision that limits approvals or caps population. These provisions remain in effect until January 1, 2025. Specifically, Government Code section 66300, subdivision (b)(1)(D), with limited exception not applicable here, does not allow affected jurisdictions to adopt new or enforce existing limits on the number of land-use approvals or permits. The City should evaluate consistency with these requirements and if necessary, immediately void or suspend the annual growth cap.

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including impact, water, sewer hookup fees, school, and other regional fees, and then, the element must analyze their impacts as potential constraints on housing supply and affordability. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. For additional information and a sample analysis and tables, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>.

Local Processing and Permit Procedures: The element states that a community meeting is required for multifamily projects (page 1-58). The element should describe and analyze how this meeting relates to the approval of the project, if the community meeting is required for both discretionary and non-discretionary projects, and any impacts to the project in terms of cost and approval certainty. In addition, the element should describe the City's SB 35 (Chapter 366, Statutes of 2017) streamline ministerial approval process and application.

Zoning, Development Standards and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards and fees for each parcel on the jurisdiction's website.

Low Barrier Navigation Centers and Permanent Supportive Housing: Low barrier navigation centers and permanent supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code sections 65651 and 65662. The element must demonstrate compliance with this requirement and include programs as appropriate.

Constraints on Housing for Persons with Disabilities: The element states the City utilizes an adopted reasonable accommodation (RA) policy (page 1-54). The analysis must include a list of the required approval findings for RA requests. Additionally, the

element states that community care facilitates serving seven or more persons is subject to a conditional use permit (page 1-50). The element should evaluate approval requirements for impacts on objectivity and approval certainty. For example, excluding this housing from residential zones, excluding community care facilitates from the definition of family (page 1-55), or imposing standards such as compatibility with surrounding uses without clarity would be considered a constraint. The element must include programs as appropriate to address identified constraints based on the outcomes of this analysis.

6. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

The element states Media Village/Silverwinds has affordability in perpetuity (Page 1-37, Table 25); however, according to our resources at Community Housing Partnership (CHP), it is set to expire in 2029. The element must update or confirm this information. If units are identified as at-risk within a 10-year period, the analysis of at-risk units must include the following (Gov. Code, § 65583, subd. (a)(9).):

- Earliest date of change from low-income use; and
- Estimated total cost for producing, replacing, and preserving the units at risk.
- Identification of public and private non-profit corporations known to the City/County to have the legal and managerial capacity to acquire and manage at-risk units.
- Identification and consideration of use of federal, state, local financing and subsidy programs.
- Specific and proactive program actions to preserve the at-risk units.

C. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in the Finding B4, the element does not include a complete sites inventory or analysis; as a result, the adequacy of sites and zoning has not been established. Based on the results of a complete sites inventory and analysis, programs may need to be added, or revised, to address a shortfall of sites and zoning for a variety of housing types.

Sites Identified in Multiple Planning Periods: The element must include a program for vacant sites identified in two of more consecutive planning periods' housing elements, or nonvacant sites identified in a prior housing element, that are currently identified to accommodate housing for lower-income households. The program must be implemented within the first three years of the planning period and commit to zone for the following:

- Sites must meet the density requirements for housing for lower-income households.
- Site must allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower-income households (Gov. Code, § 65583.2, subd. (c)).

Nonvacant Sites Reliance to Accommodate RHNA: As the element relies upon nonvacant sites to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards. For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/program-requirements/identify-adequate-sites.shtml>.

Lot Consolidation/Small Sites: As the element relies on consolidated small sites to accommodate the RHNA for lower-income households, it should include a program(s) to facilitate lot consolidation and development of housing on small sites. For example, the program could commit to (1) granting density bonuses above state density bonus law (Gov. Code, § 65915.); (2) deferring fees specifically for consolidation; (3) expediting permit processing; (4) identifying and targeting specific financial resources; and, (5) modifying development standards. For additional information, see the *Building Blocks*' at <http://www.hcd.ca.gov/community-development/building-blocks/program-requirements/address-remove-mitigate-constraints.shtml>.

2. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

While the element includes programs to assist in the development of very low-, low-, and moderate-income households, it must also include a program(s) to assist in the development of housing affordable extremely low-income (ELI) households. The City should also review and incorporate public comments as appropriate. Programs must be revised or added to the element to assist in the development of housing for ELI households. Program actions could include prioritizing some funding for housing developments affordable to ELI households and offering financial incentives or regulatory concessions to encourage the development of housing types, such as multifamily, single-room occupancy (SRO) units, to address the identified housing needs for ELI households. The element states there is need

for rentals for large households (page 1-19). The element should add a program to address this identified need. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding B5 the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For example, Program 3: Preserve and Protect Existing Tenants and Housing, states that implementation will address tenant protection. However, the program should be expanded to describe why and how this program will address inequities through listing specific deliverables, objectives, and metrics. All programs need to be reviewed to incorporate meaningful actions.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

While the element includes a general summary of the public participation process (page 1-5 and Appendix F), it must also describe how public comments were considered and incorporated into the element.

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

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www.hcd.ca.gov



February 1, 2022

Patrick Prescott, Director
Community Development Department
City of Burbank
150 N. Third St.
Burbank, CA 91502

Dear Patrick Prescott:

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

Thank you for submitting the City of Burbank's (City) draft housing element received for review on December 3, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on January 28, 2022, with Federico Ramirez, Assistant Community Development Director; Scott Plambaeck, Deputy City Planner; Shipra Rajesh, Associate Planner and the City's consultants Karen Warner and Josh Oshimo. In addition, HCD considered comments from Abundant Housing LA pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov

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

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

HCD appreciates the cooperation and dedication the City planning staff, and Karen Warner provided during the course of our review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Divya Sen, of our staff, at Divya.Sen@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall". The signature is stylized and cursive.

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF BURBANK

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

Disparities in Access to Opportunity: The element includes limited local and regional data and analysis on access to opportunity of education, economic, transportation (pp. B-27 to B-34). However, a complete analysis should include an analysis of disparities in relation to education, economic opportunity, transportation at the regional level and analyze the data for trends and patterns.

Disproportionate Housing Needs: The element includes some local and regional data on cost-burdened households, overcrowding, homelessness and substandard housing, but does not include data on trends or patterns for regional analysis on homelessness. The element should include a complete regional data for homelessness and analyze the data and include an evaluation of impacts on protected characteristics, local patterns and access to opportunity such as services and programs.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): While the element addresses most of the analysis on housing development at income-levels and evaluates the sites relative to socio-economic patterns (pp. B-46 to B-50), it must also include analysis for integration & segregation patterns and trends related to people with protected characteristics and lower incomes. Based on the final analysis, the site inventory analysis should be updated to address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group. This analysis should be supported by local data and knowledge and other relevant factors. In addition, The element states that over one half of the lower-income units are on sites susceptible to displacement risk, the City should identify what measures will be utilized to provide protection from displacement pressures (p. B-49).

Goals, Priorities, Metrics, and Milestones: The element added contributing factors, priority level, and actions with limited metrics and milestones (pp. B-53 to B-57). Actions have milestones but must also have clear metrics to address progress and viability of prioritized actions and go beyond the status quo to address housing mobility enhancement, new housing choices, place-based strategies for community preservation and revitalization, and displacement protection. In addition, the element identifies a number of actions in Table B-10 that are not reflected in the program commitments (pp. 1-108). Housing element program actions must be revised for consistency.

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a regional housing needs allocation (RHNA) of 8,772 housing units, of which 3,971 are for lower-income households. To address this need, the element relies on pending and entitled residential projects, specific plans, and accessory dwelling units (ADUs). To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Realistic Capacity: While the element provides that "both specific plans selected sites within the respective planning areas exclusively nonresidential; however, for the Site Inventory, only sites with potential residential uses were included numerous" (pp. 1-85), this statement is insufficient to analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow nonresidential uses (e.g., mixed-use). To address this finding, the element could provide total potential of buildout of both specific plans and compare it to the capacity of selected sites and development trends supporting residential development.

Small Sites: The revised element includes a program to encourage lot consolidation for the small parcels identified in the inventory, but still does not analyze the City's capacity for aggregating small parcels. The analysis could describe the City's role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for redevelopment, recent trends of lot consolidation, and/or information on the owners of each aggregated site. To assist in this analysis, the element could relate the conditions that led to the consolidation of projects listed on Table 1-42 to the identified sites.

Large Sites: Sites larger than 10 acres in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower income

housing. (Gov. Code, § 65583.2, subd. (c)(2)(A).) While the element includes some supporting analysis on TOD 4-Old IKEA and TOD 6-Burbank Town Center large sites, it should expand on how the example project provided are related to large sites by size, affordability, or other factors.

Suitability of Nonvacant Sites: While the element has some analysis that existing use is not an impediment on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households (pp. 1-78 to 1-83, Appendix D), it must also include analysis on how the existing uses will likely discontinue in the planning period. The analysis could provide information on existing leases, provide relevant information from the Downtown TOD Specific Plan market study, connect market trends or past examples relating to identified sites to show the likelihood of discontinuation, and include specific programs to facilitate development on lower-income sites.

Accessory Dwelling Units (ADU): The City is counting an average of 200 ADUs per year for a total of 1,600 ADUs to accommodate its RHNA. HCD's records indicate that the City has permitted 54 ADUs in 2018, 110 in 2019, 97 in 2020. The City provided additional documentation stating that it has permitted 243 ADUs from January through September 2021. When considering ADU permits issued since September 2021, the City averages 134 ADUs a year. As a result, the element should be revised to reduce the number of ADUs to accommodate the City's RHNA. In addition, while the element added Program 6b (Track and Monitor Accessory Dwelling Units), it should be revised to commit to monitor ADU production and affordability on more frequently than mid-cycle.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (a)(5).)*

Local Processing and Permit Procedures: While the element includes the purpose of the community meeting for multifamily (pp. 1-63), it should also provide detail information on the appeal process and analyze it for constraints. For example, the element could indicate if there are any requirements or parameters for requests for appeals.

Constraints on Housing for Persons with Disabilities: While the element includes reasonable accommodate process (pp. 1-58 to 1-59), it must include the findings for approval. The element should also analyze the finding that “for an accommodation to be denied, the requested accommodation must cause undue hardship or cause operational problems” for consistence with fair housing requirements. For example, HUD/DOJ guidance states, “For an accommodation to be denied, the requested accommodation must cause an undue financial and administrative burden or it would fundamentally alter the nature of the provider's operations.”

B. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.*
(Gov. Code, § 65583, subd. (c)(1).)

As noted in Finding A2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

Sites Identified in Multiple Planning Periods: In conversations with the City, the two sites identified from the previous planning period is pending entitlement. Please be aware, should these entitlements not be completed, the City must allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower-income households. (Gov. Code, § 65583.2, subd. (c).) The element should commit to monitor the pending entitlement of these projects and allow for by-right approval on those sites if projects are not approved as indicated.

Nonvacant Sites Reliance to Accommodate RHNA: As the element relies upon nonvacant sites to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards or proactively advertise and seek

development opportunities on city-owned sites through requests for proposals or other mechanisms.

2. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

While the element includes Program 10 (Inclusionary Housing Ordinance) to support rentals for large households, it should specifically address how the City is assisting large families through that ordinance. For example, the element could describe what incentives are being provided for the provision of large family units.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding A3, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element must include a complete analysis of affirmatively furthering fair housing (AFFH). Based on the outcomes of that analysis, the element must add or modify programs.

C. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

Moving forward and up to adoption, the City should continue to employ additional methods for public outreach efforts, particularly including lower-income and special needs households and neighborhoods with higher concentrations of lower-income and special needs households.

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

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www.hcd.ca.gov



June 3, 2022

Patrick Prescott, Director
Community Development Department
City of Burbank
150 N. Third St.
Burbank, CA 91502

Dear Patrick Prescott:

RE: City of Burbank's 6th Cycle (2021-2028) Revised Draft Housing Element

Thank you for submitting the City of Burbank's (City) revised draft housing element update received for review on April 4, 2022 with revisions received on May 27, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Abundant Housing LA pursuant to Government Code section 65585, subdivision (c).

The revised draft housing element addresses most statutory requirements described in HCD's February 16, 2022 review; however, additional revision is necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code), as follows:

Affirmatively further[ing] fair housing (AFFH) in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)

Goals and actions must significantly seek to overcome contributing factors to fair housing issues and include related metrics and milestones. Specifically programs should be modified to provide geographic targeting to address patterns and trends and increase housing mobility and choices in higher resourced areas of the City. In addition, some programs still require specific metrics to target meaningful fair housing results. Actions on Table B-11 that could be modified include:

Downtown TOD Specific Plan (Page B-67): Provide a goal or metric for the number of accessible units the City anticipates will be achieved.

Accessory Dwelling Unit (ADU) Production (Page B-67) and (Page B-74): Provide a goal or metric for the number of ADU units the City anticipates will be achieved. The

City could also provide geographic targeting for this program to increase production in existing higher resourced single family neighborhoods.

Rental Assistance Voucher Program (Page B-69): This action could include geographic targeting to ensure the provision of vouchers through out the City, especially in higher resourced neighborhoods.

Inclusionary Housing Ordinance (Page B-69): Provide a goal or metric for the number of units the City anticipates will be achieved. This metric could also include a geographic target for higher resourced areas.

Anti-displacement Programs (Page B-71): Provide specific metrics.

Healthy Homes (Page B-75): This program could include specific geographic targeting to improve conditions in vulnerable neighborhoods.

The element will meet the statutory requirements of State Housing Element Law once it has been revised and re-adopted to comply with the above requirements.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), as the City failed to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), Program 8 (Housing Opportunity Sites & Rezone Program) must be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

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

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

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

HCD appreciates the hard work and dedication Karen Warner, the City's consultant provided in preparation of the City's housing element and looks forward to receiving the City's adopted housing element. If you have any questions or need additional technical assistance, please contact Divya Sen, of our staff, at Divya.Ram@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager



May 24, 2021

Burbank City Council
Burbank City Hall
275 E. Olive Avenue
Burbank, CA 90512

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Burbank's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding Burbank's 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law. We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

In October 2020, AHLA shared [a letter with the City of Burbank](#), providing guidance on how the City should fulfill both the letter and the spirit of housing element law. We have reviewed the City's draft Housing Element, **and have major concerns about the City of Burbank's willingness and ability to meet its state-mandated RHNA targets.** The staff report and draft site inventory are inconsistent with HCD's instructions and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686.

The following issues are of particular concern to us:

1. Planning's process for selecting sites and assessing their capacity does not accurately estimate parcels' likelihood of development or net new units if redeveloped. Therefore, Planning has not identified enough sites where 8,750 homes will realistically be developed by 2029.

An accurate assessment of the site inventory's housing capacity is necessary in order for the housing element to achieve sufficient housing production. The site capacity estimate should account for the following **two factors**:

- What is the likelihood that the site will be developed during the planning period?
- If the site were to be developed during the planning period, how many net new units of housing are likely to be built on it?

These are the **likelihood of development**¹ and **net new units if developed**² factors, as required by HCD guidelines. The portion of the jurisdiction's RHNA target that a site will realistically accommodate during the planning period is:

(likelihood of development) x (net new units if developed) = realistic capacity.

Planning's analysis identifies 12 sites in Burbank's Downtown and 7 sites in the Golden State Specific Plan, totaling 95.7 acres and containing theoretical zoned capacity for about 6,100 housing units. However, Planning does not estimate the likelihood of development for these parcels. Instead, Planning only provides a cursory discussion of why these sites may be good candidates for redevelopment, without providing quantitative evidence or analysis. Although Planning claims "property owner and/or developer interest in acquiring and assembling underdeveloped parcels into larger development sites",³ Planning did not share any letters from property owners indicating their interest in selling or redeveloping these sites.

Per HCD guidelines, if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites (as Burbank does), the jurisdiction must make findings supported by "substantial evidence" that the sites' existing uses are "likely to be discontinued during the planning period."⁴ **Planning did not follow this instruction, which is a requirement under Assembly Bill 1397.**

We disagree with Planning's contention that all 19 sites will all be redeveloped by 2029. For example, the Site Assessment assumes that all four acres of Golden State Specific Plan block No. 1 (Lima/Avon) will be built out at the density of Downtown Burbank (84 units per acre), producing 334 homes.⁵ However, this block is entirely occupied by a variety of light industrial businesses, including the popular Lincoln Beer Company. Planning provided no evidence that the site is nonviable as industrial land, or that the various property owners intend to sell.⁶

Similarly:

- The owners of TOD 6 (Burbank Town Center) spent \$60 million to renovate the property in 2018.⁷ It seems unlikely that the property will be redeveloped with *any* housing, much less the anticipated 1,020 new homes.
- TOD 7, the Civic Center parking lots, are owned by the City of Burbank. The City showed no interest in developing any city-owned land during the previous RHNA cycle, and provided no evidence that this stance will change during the 6th cycle.
- TOD 8 is fully occupied by a variety of small businesses.

¹ [HCD Site Inventory Guidebook, pg. 20](#)

² [HCD Site Inventory Guidebook, pg. 21](#)

³ Burbank Draft Housing Element, pg. 1-71

⁴ Gov't Code 65583.2(g)(2), also [HCD Site Inventory Guidebook, pg. 26-28](#). "when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period."

⁵ Draft Housing Element, pg. D-26

⁶ <https://www.lincolnbearcompany.com/>

⁷ https://www.burbanktowncenter.com/wp-content/uploads/sites/130/2018/10/BurbankRenovationsCostPlus_FINAL-1.pdf

- GSSP 5 is the parking lot for a busy office complex which hosts Insomniac Games, a video game studio.

Housing production data from the 5th cycle further casts doubt on Planning’s implicit assumption that all 19 sites will be redeveloped by 2029. At the outset of the 5th cycle, Burbank claimed a theoretical capacity of roughly 5,573 more housing units. Through 2019, Burbank permitted 501 housing units, which equates to 668 housing units permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues through 2021). This implies that in Burbank, excess zoned capacity has a **12% likelihood of being developed** (668 actual units divided by 5,573 theoretical units).⁸

The City must fairly estimate the likelihood of development for all parcels on the suitable sites inventory. The City of Sacramento’s [draft site inventory](#) provided a high-quality, numerical analysis of the likelihood of their sites’ development through a “tiered classification system to classify the non-vacant underutilized sites”.⁹ Sacramento’s good approach offers a model for Burbank to build on.

Recommendations:

- 1.1 Provide a quantitative estimate of parcels’ development probabilities, and incorporate this factor into the estimate of sites’ realistic capacity.**
- 1.2 Report the proportion of sites in the previous housing element’s inventory that were developed during the planning period.**
- 1.3 Share letters from owners of the site inventory parcels, indicating their interest in selling or redeveloping these properties during the 6th Cycle.**
- 1.4 Remove parcels from the site inventory where redevelopment is unlikely to occur during the 6th Cycle.**
- 1.5 Commit to a mid-cycle review to verify Planning’s assumptions about development probabilities.** If it turns out that sites within a tier, or category, were developed at a lower-than-expected rate during the first half of the cycle, then the city should rezone for additional capacity or make other appropriate adjustments for the second half of the planning period.
- 1.6 If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely.**

2. Planning assumes that 2,180 housing units that were approved or pending approval during the 5th Cycle will be built during the 6th Cycle, without accounting for the near-certainty that some projects will never be built.

The City counts 1,245 units in projects pending entitlement and 935 units in approved projects towards Burbank’s 6th cycle RHNA target, and assumes that all 2,180 units will ultimately be

⁸ [Burbank 5th Cycle Housing Element, pgs. 20, 48](#). Burbank’s housing element claims a citywide capacity of 50,219 housing units under current zoning (pg. 48). Burbank had 44,646 units in 2010 (pg. 20). This suggests a citywide claimed capacity of 5,573 units.

⁹ [Public Review Draft, City of Sacramento Housing Element 2021-2029, p. H-2-15](#)

built. This is a faulty assumption: not every pending project gets approved, and not every approved project gets built. Although some of the projects listed here are currently under construction, like the First Street Village, most are not, and many may never be.

While the City may count permitted or entitled units towards its 6th Cycle RHNA goals, it must **realistically** estimate how many of these units will ultimately be built during the 6th Cycle, based on recent historical data. The [City of Los Angeles' Initial Study](#) counted active planning entitlements, approved planning entitlements with no building permit, and permitted projects that have not yet been completed towards its 6th Cycle RHNA goals, but discounted each category based on the share of proposed units expected to be built, using the City's historical data.

Planning must incorporate a similar estimate into its Inventory Analysis. Using data from recent projects, the City of Los Angeles estimated that 37% of projects with pending entitlements, 45% of projects with approved entitlements, and 79% of permitted projects, are ultimately completed.¹⁰ Burbank, with more restrictive permitting and less than half the housing growth rate of Los Angeles, should discount the number of pending and approved entitlements counted toward its RHNA target by *at least* the same factors:

1,245 units pending entitlement x 37% chance of completion = 461 units
935 units entitled x 45% chance of completion = 421 units

Thus, the City might reasonably claim 882 units from pending and entitled projects towards the RHNA target. Alternatively, Planning could use local data from recent projects to estimate these percentages. **But Planning should certainly not count 2,180 units towards its 6th cycle RHNA goal.**

Recommendation:

2.1 Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.

3. *Planning makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies, without providing evidence to support this claim.*

HCD has established two safe harbors for forecasting ADU production during the 6th Cycle¹¹. One option ("Option #1") is to project forward the local trend in ADU construction since January 2018. The other, for use when no other data is available ("Option #2"), assumes ADU production at five times the local rate of production prior to 2018.

¹⁰ [Initial Study, City of Los Angeles, pg. 21](#)

¹¹ [HCD Site Inventory Guidebook, pg. 31](#)

Burbank issued permits for 54 ADUs in 2018, 110 ADUs in 2019, and 112 ADUs in 2020. Under a correct calculation of HCD’s “Option #1”, Burbank would take the average of the ADU permitting trend between 2018 and 2020, and forecast that 92 ADUs will be permitted per year during the 6th Cycle. **This would allow for a total 6th cycle forecast of 736 ADUs.**

However, Planning counts 1,600 ADUs, or 200 ADUs per year, towards the City’s RHNA target. Planning contends that a small reduction in processing fees, expedited application review, and pre-approved ADU plans will lead to a doubling in the number of ADUs permitted annually going forward.¹² But Planning provides no tangible evidence that these relatively minor incentives will yield this outcome.

The housing element therefore significantly overstates the likely production of ADUs during the 6th cycle, possibly as a tactic to avoid rezoning. **Planning must correct its calculation of the ADU safe harbor, and simply apply the average of annual ADU permits issued between 2018 and 2020, per HCD’s guidelines.**

Recommendations:

3.1 Burbank must use HCD’s Option 1 safe harbor, and project that 736 ADUs will be permitted during the 6th Cycle. High-quality data is available on the local trend in ADU construction since January 2018, so this is the appropriate safe harbor to use. If the City believes that higher ADU production forecasts are warranted, it must provide well-grounded estimates, based on the pace of ADU production in neighboring jurisdictions, and must explain what programs or policy efforts it will adopt that would lead to higher ADU production than it currently observes.

3.2 Follow HCD’s recommendation to track ADU and JADU creation and affordability levels, and commit to a review at the planning cycle midpoint to evaluate if production estimates are being achieved.¹³ Burbank’s housing element should commit to mid-cycle rezoning if ADU production is lower than forecasted, and its midpoint review should be linked with immediate and automatic programs to increase housing production in the second half of the RHNA cycle. Our recommended approach is to incorporate by-right density bonuses on inventory sites, which would automatically take effect mid-cycle if the ADU target is not met. The density bonus should be large enough, and apply to enough parcels, to fully make up for any ADU production shortfall.

4. Planning did not propose adequate reforms to address the major constraints on redevelopment that exist in Burbank.

Building housing in Burbank is difficult, expensive, and time-consuming. Development timelines are long, with an average time of 12-16 months for multifamily project approval.¹⁴ Mixed-use projects take even longer, requiring a 3-4 year approval process and a conditional use permit

¹² Draft Housing Element, pg. 1-74

¹³ [HCD Site Inventory Guidebook, pg. 31](#)

¹⁴ Draft Housing Element, 1-59

(for which approval can take 12-16 months alone).¹⁵ This process is a major impediment to housing production.

Burbank's housing stock only grew 0.7% between 2015 and 2020¹⁶ (putting it 43rd out of 89 jurisdictions in Los Angeles County), despite extremely strong demand for housing as evidenced by high rents (the median renter household pays \$1,555/month, 37rd-highest in Los Angeles County)¹⁷. Similarly, the ratio of home price to replacement cost is 2.6, one of the highest in the county.¹⁸ Per Professor Chris Elmendorf of the University of California, Davis and his co-authors of [Superintending Local Constraints on Housing Development](#), the above data suggest that restrictive land use rules are making homebuilding difficult in Burbank, leading to continued shortage and high costs.

Housing element law requires cities to provide an analysis of constraints on housing development, as well as a program to mitigate or remove these constraints. While the Draft Housing Element discusses constraints in detail, including long approval timelines, strict limits on building size, high construction costs, and a lack of local funding for affordable housing production, the report does not commit to a strong enough program to remove policy constraints that deter housing production. Merely recommending “a program to review and update the City’s multi-family development standards, including re-evaluation of parking, setbacks, height and other standards to enable compact, well-designed multi-family product types”¹⁹ is inadequate: **the City must commit to specific policy changes and rapid implementation.**

Other cities in California have successfully implemented process reforms that streamline housing production. The City of Los Angeles’ Transit Oriented Communities program approves qualifying projects by-right, leading to an average approval time of 6 months for by-right projects. Santa Monica recently made all new residential and mixed-use development project approvals by-right, and has gotten its approval time down to six months or less for most new development. But the best ordinance to emulate comes from Sacramento, where the Ministerial Housing Ordinance provides for ministerial approval of 2-150 unit mixed-use and multifamily projects within 60 days, and 151-200 unit mixed-use projects in 90 days.²⁰ This would dramatically streamline the process of building new housing, and reduce the administrative workload on city staff by reducing the number of unnecessary hearings and studies.

We urge Burbank to commit to major constraint removal policies in order to encourage strong housing growth at all levels of income.

Recommendations:

¹⁵ Draft Housing Element, 1-59

¹⁶ California Department of Finance, Report E-5, 2020

¹⁷ American Community Survey

¹⁸ Elmendorf et al., [Superintending Local Constraints on Housing Development](#), 2020

¹⁹ Draft Housing Element, pg. 1-44

²⁰ <https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/Ministerial-Housing>

- 4.1 **Establish a fast by-right review process for all new multifamily and mixed-use buildings which meet the zoning law and the General Plan.** Sacramento's Ministerial Housing Ordinance is an excellent model to follow.
- 4.2 **Pre-approve standard ADU, small-scale "missing middle" multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.**
- 4.3 **Eliminate the conditional use permit requirement for mixed-use projects.**
- 4.4 **Reduce restrictions on maximum height, floor-area ratio, and lot coverage.**

5. The housing element does not promote new housing opportunities on parcels where apartments are currently banned, even near the planned NoHo-Pasadena busway. Instead, it concentrates lower-income housing opportunities in areas with significant noise and air pollution exposure. This approach fails to affirmatively further fair housing and reverse existing patterns of residential segregation.

AB 686 (2018) requires housing element updates to "affirmatively further fair housing", which is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.

In April 2021, HCD issued an [AFFH Guidance Memo](#), which establishes a number of important principles for promoting fair housing, including:

- A city's AFFH analysis should reveal "current and historical spatial patterns of subsidized housing within and surrounding the jurisdiction, including emergency shelters, subsidized affordable housing, supportive housing, and usage of housing choice vouchers."²¹
- The distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. To demonstrate that the site inventory furthers fair housing, the city must calculate the percentage of households at lower, moderate, and above-moderate income levels in each census tract or "block group" in the city, and then do the same for the lower, moderate, and above-moderate-income RHNA units assigned to the tract or block group. The share of lower-income RHNA units assigned to tracts (or block groups) with a higher-than-average share of lower-income households should be less than the current share of lower-income households in those tracts.²²
- The housing element must benchmark the citywide distribution of household incomes against the distribution in the county or region, and state. The AFFH program of a predominantly high-income city, like Burbank, must break down barriers that keep lower income and minority households from accessing housing in the city.²³
- "Goals, policies, and actions" to further fair housing must be "aggressively set to overcome ... contributing factors [to fair housing problems, and thus] to meet the

²¹ AFFH Guidance Memo, p. 46

²² AFFH Guidance Memo, p. 47

²³ AFFH Guidance Memo, pp. 15, 32-34, 77

‘meaningful impact’ requirement in statute.”²⁴ The list of actions shall include concrete timeframes for implementation, measurable outcomes, explicit prioritization (“high,” “medium,” or “low”), and “must be created with the intention to have a significant impact, well beyond a continuation of past actions.”²⁵

- “The schedule of actions generally must” (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.²⁶

In our region, housing policy and land use regulations were once used to exclude members of minority groups. [Redlining and restrictive covenants](#), which restricted where Black, Latino, and Asian Americans could live, were once common in Los Angeles County. Discrimination in housing takes other forms today: even after *de jure* segregation was banned, opponents of neighborhood change in prosperous areas [weaponized zoning policy](#) to make apartment construction illegal in much of Los Angeles County, especially in high-income areas. Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households away from high-cost, high-opportunity cities.

To this day, apartments are banned on [80% of the residentially-zoned land in Burbank](#). The median home sale price in Burbank was \$755,000 in 2018, and 54% of the city’s renters are “rent-burdened” (i.e. they spend more than 30% of their income on rent)²⁷. This denies historically disadvantaged groups housing opportunities near job centers, quality schools, and other public resources, a situation that persists today.

The City is obligated to promote fair housing opportunities and undo patterns of segregation. Burbank should follow HCD’s recommendation that cities distribute lower-income housing opportunities throughout the city, and recommends that cities first identify development potential for lower-income housing in high-opportunity neighborhoods.²⁸ **This would mean rezoning more parcels, including residential parcels currently zoned single-family only, to encourage enough housing growth to achieve the RHNA target in full.**

However, the City’s proposed site inventory does not include enough parcels to make achievement of the RHNA target likely. The city proposes no rezoning on any R1-zoned parcels, even those that are near the forthcoming NoHo-Pasadena Metro Busway. This is a recipe for missing the RHNA target, which means that the housing element is unlikely to advance the goal of socioeconomic integration or greater housing affordability.

Also, by proposing to accommodate 75% of the lower-income RHNA target in the Downtown and Airport districts only, which are locations with significant exposure to noise and air pollution, and by failing to encourage housing growth in other residential neighborhoods, where

²⁴ AFFH Guidance Memo, p. 52

²⁵ AFFH Guidance Memo pp. 52, 71

²⁶ AFFH Guidance Memo, p. 54

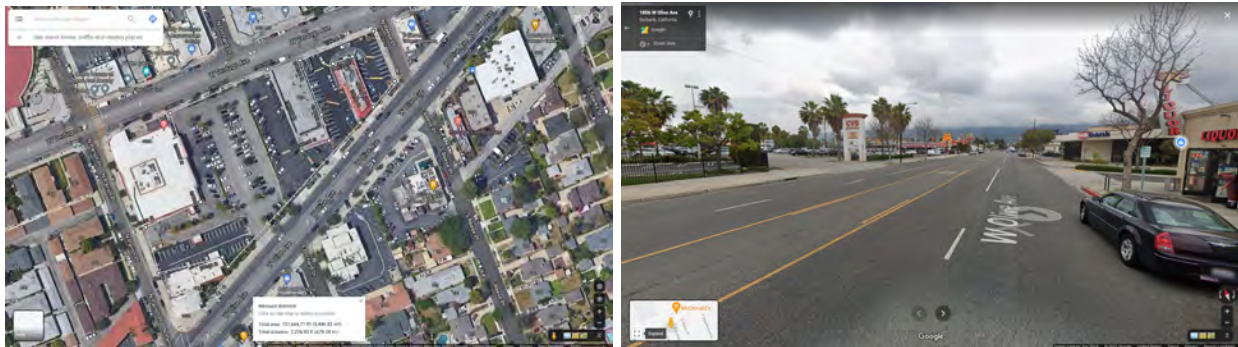
²⁷ [Abundant Housing LA letter to Burbank, October 2020](#)

²⁸ [HCD Site Inventory Guidebook, pg. 3](#)

environmental quality is significantly better, the City risks perpetuating the concentration of lower-income households in areas with poor environmental quality.

Burbank should promote additional housing opportunities, including housing for lower-income households, by allowing small apartment buildings and townhouses citywide. It is especially important for Burbank to legalize multifamily housing production near the NoHo-Pasadena Metro Busway. The line will serve most of Burbank’s major employers and destinations²⁹, with stations planned at Hollywood Way/134 (Warner Bros., Burbank Studios), Alameda/Naomi (Providence-St Joseph, Disney, CBS), Olive/Verdugo, Olive/Lake (Nickelodeon Animation), Olive/San Fernando (Downtown Burbank), and Glenoaks/Alameda.³⁰

But outside Downtown, the housing element does not encourage new housing growth near any of these stations, even though many sites near the stations are perfect for redevelopment. Most commercial buildings near the busway stations are squat one- and two-story buildings built after World War II, with large surface parking lots. For example, the block bracketed by Verdugo, Parish, Olive and Reese is 100 yards away from a planned busway station. Currently, it has a few squat commercial buildings and 2.3 acres of surface parking.



Squat commercial buildings with large surface parking lots line the busway corridor.

The other buildings along this corridor also present opportunities for new housing. For example, the Buena Vista Branch Library has an oversized 1.9 acre parking lot, and the Olive Rec Center has a 2.8 acre parking lot. The same is true of residential areas, which frequently contain older tract homes on large lots.

The commercial areas near the busway are mostly zoned C2 (Limited Commercial), while the residential areas are mostly zoned R1 (Single-Family Residential), with high mandatory parking requirements, broad setbacks, and limited density. This means that Burbank’s current zoning does not allow current and future residents to fully benefit from the busway.

²⁹ Namely, [Warner Bros., Disney, Providence-St Joseph, Deluxe, ABC, and Nickelodeon.](#)

³⁰ <http://media.metro.net/2021/4-1-21-NoHo-Pas-Community-Update-Meeting.pdf>



Zoning map overlaid with planned Metro Busway stations.

The City should rezone all residential areas within a 10-minute walk of busway stations for apartments at Downtown densities, and rezone commercially-zoned land for mixed-use development, with loosened parking, setback, open space and height requirements. When rezoning, Burbank should emulate the City of Los Angeles’s Transit Oriented Communities program, which offers generous by-right density bonuses to developers who include affordable housing in new developments near mass transit. Transit Oriented Communities has led to the [proposal of over 30,000 homes](#) (of which 20% are deed-restricted affordable units) in Los Angeles, built at no cost to the taxpayer.

New housing and businesses near transit are good for everyone. They’re good for Burbank residents, particularly those who have been denied fair housing opportunities due to their race or income. They’re good for City finances, due to increased property and sales taxes (Redwood City analyzed the impact of new housing construction on its General Fund, and found that each new multifamily unit brought in additional net revenue of \$254 per year).³¹ They’re good for Burbank merchants, because new residents mean new customers. They’re good for Burbank

³¹ <https://meetings.redwoodcity.org/AgendaOnline/Meetings/ViewMeeting?id=2245&doctype=1>

schools, which currently face declining enrollment due to the aging population.³² They're good for the environment, because someone who lives and works in Burbank can walk, bike, or take the bus to work, instead of clogging the 134 freeway. And rezoning is good for current homeowners, because a parcel's value increases if it's legal to build more homes on that parcel.³³

Recommendations:

- 5.1 Upzone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in Burbank's highest-opportunity areas, including areas within a 10-minute walk of future busway stations. This should include R1 parcels where single-family detached homes are currently mandated by law.**
- 5.2 Ensure that housing opportunities for lower-income households are not concentrated in neighborhoods with high concentrations of low and moderate income households, or in neighborhoods with significant exposure to noise or air pollution.**
- 5.3 Enact a citywide small lot subdivision ordinance modeled on the policy in Los Angeles.**
- 5.4 Introduce a density bonus program similar to Los Angeles' Transit Oriented Communities program (with 50-80% density bonuses) to permit additional affordable housing to be built near mass transit.**
- 5.5 Eliminate on-site minimum parking mandates, which drive up the cost of housing production and reinforce car dependency.**
- 5.6 Identify new funding sources and public resources to encourage the production of affordable housing, such as reform of the City's real estate transfer tax and introduction of congestion pricing.**
- 5.7 Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning.**

The City of Burbank has a legal obligation to sufficiently plan to meet current and future residents' housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we've highlighted above suggest that the City is not on a path to fulfilling this legal obligation. We urge you to change course and actively embrace this opportunity to provide a variety of attainable housing options for Burbank's residents and workers.

Finally, state law imposes penalties on jurisdictions that fail to adopt a compliant 6th Cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units or are 100% moderate-rate projects³⁴.

³² Draft Housing Element, 1-11

³³ [Upzoning Chicago: Impacts of a Zoning Reform on Property Values and Housing Construction](#)

³⁴ [California Government Code 65589.5\(d\)\(5\)](#)

Noncompliant jurisdictions may also lose the ability to issue building permits, potentially including permits for kitchen and bath renovations. Jurisdictions that want to maintain local control over new development should therefore plan to adopt a compliant housing element update on time.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Assemblymember Laura Friedman, California State Assembly
Assemblymember David Chiu, California State Assembly
Senator Scott Wiener, California State Senate
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD



June 28, 2021

Anthony Dedousis, Director of Policy and Research
Abundant Housing LA

**Subject: Follow Up Regarding Abundant Housing LA’s Comments on Burbank
Draft 6th Cycle Housing Element**

Dear Mr. Dedousis:

The Community Development Department – Planning Division would like to thank you for reviewing and providing your comments and concerns regarding the City’s Draft 6th Cycle Housing Element Update. To follow up on the meeting we had earlier in June, and as discussed in City staff’s presentation to the City Council on May 25, below is a summary of staff’s responses to the key comments/concerns that were noted in your letter dated May 24, 2021. We hope that you will continue to engage with us as we await HCD’s 60-day review of the City’s draft 6th Cycle Housing Element.

Abundant Housing Comment #1: *Planning’s process for selecting sites and assessing their capacity does not accurately estimate parcels’ likelihood of development or net new units if redeveloped. Therefore, Planning has not identified enough sites where 8,750 homes will realistically be developed by 2029.*

The opportunity sites in the draft housing element were selected based on site-specific factors that are supportive of redevelopment with housing during the 8-year planning period. The sites are also opportunity sites within the two major specific plan update projects (Golden State Specific Plan and the Downtown Burbank Transit Oriented Development TOD Specific Plan) currently underway in the City. Both specific plans are anticipated for consideration by the City Council within calendar year 2022. The approach taken to use opportunity sites from the specific plans as opportunity sites for the Housing Element is intended to establish consistency throughout the City’s long range planning documents. The timing of the Housing Element coinciding with the specific plan projects provides a unique opportunity to do so. Additionally, the sites themselves are optimal for facilitating new housing development given their size, status of the existing uses, proximity to the City’s job and transit centers (consistent with city, regional and state efforts to reduce greenhouse gas emissions), and direct communication from various developers and/or property owners indicating interest and intent to pursue housing.

ADMINISTRATION	✦	BUILDING	✦	HOUSING, ECONOMIC DEVELOPMENT & SUCCESSOR AGENCY	✦	PLANNING	✦	SECTION 8 & CDBG	✦	TRANSPORTATION
818.238.5176		818.238.5220		818.238.5180		818.238.5250		818.238.5160		818.238.5270

The strategies being developed as part of the specific plans will be significant in increasing the likelihood of development on the housing element sites –and within the specific plan areas generally – by improving the development standards and streamlining project review. The Golden State Specific Plan also involves significant upzoning of residential density including on the opportunity sites. Additionally, the City recently received funds through SCAG's Sustainable Communities Program in addition to funds previously awarded through LEAP to update the existing Media District Specific Plan. This update is anticipated to occur in 2023 and would result in similar code and process improvements as those that will be established with the Golden State and Downtown TOD Specific Plans, and is noted in draft Housing Element Program #5.

In response to Abundant Housing's comments, City staff has added descriptions of the suitability of each opportunity site by summarizing our knowledge of site-specific factors that support housing development beyond having the zoning/General Plan in place to do so. These explanations are being included in the submittal to HCD and are enclosed with this letter for your reference. It is staff's intent to continue to augment the record concerning the viability of the opportunity sites while we await HCD's review of the draft plan. Additionally, Housing Element Program #5 was revised to include a mid-cycle review with respect to development of housing on the opportunity sites. The mid-cycle review will be an opportunity to assess the City's progress and, if necessary, make changes accordingly.

Comment #2: *Planning assumes that 2,180 housing units that were approved or pending approval during the 5th Cycle will be built during the 6th Cycle, without accounting for the near-certainty that some projects will never be built.*

The inclusion of housing units that are part of projects already-approved or pending approval is consistent with HCD sites inventory guidelines. Additionally, based on what the City has experienced with recent projects and the continued demand for housing we believe it's reasonable to assume the approved and pending projects will be built. Within the last 6 years only one developer ultimately opted not to move forward with their entitlement. Of the 8 entitled projects noted in the draft Housing Element, three are under construction and 5 are in plan check review.

We recognize that housing production in the 5th cycle was low. Since then the City Council adopted the Affordable Housing Strategy and the goal of facilitating the building of 12,000 new homes through 2035. City Council action in this regards has sent a positive message to the development community that the City is seeking to facilitate housing that helps to build neighborhoods and seeks to make positive inroads in our 3 to 1 jobs to housing imbalance. The 2,180 housing units in the pipeline reflects that policy and goal-setting at work. The housing element and specific plans will help to further advance these goals.

Comment #3: *Planning makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies, without providing evidence to support this claim.*

City staff continue to receive ADU applications, averaging about 5 submittals each week, and with the total number increasing each year since ADU regulations were updated by the State. From 2017 to date, the City has received 814 ADU submittals into plan check review and issued 445 ADU permits. From the demand the City has been experiencing over the past four years, the City

only sees ADU applications and permitting increasing. It is staff's assessment that our proposed numbers will be met as the City proposes new program initiatives as part of the Housing Update for the 6th Cycle that will bolster ADU production (including reduced fees, reduced processing times for smaller ADUs, and creation of pre-approved ADU plans). Therefore, City staff and the consultant believe 200 ADUs per year for a total of 1,600 ADUs during the eight-year planning period is realistic and achievable.

Additionally, in response to Abundant Housing's comments the draft Housing Element includes an explicit commitment to provide mid-cycle review of ADU production.

Comment #4: *Planning did not propose adequate reforms to address the major constraints on redevelopment that exist in Burbank.*

Many of the strategies recommended by Abundant Housing are included in the draft Housing Element as part of the proposed programs. Objective development standards and by-right review processes would be established through the two Specific Plans for qualifying projects including removal of the CUP requirement. Fine-tuning of the details for how this would work are being addressed through the development of the Specific Plans, with the potential to be replicated in other areas of the City including as part of the eventual update to the Media District Specific Plan. Another separate program addresses updating the multifamily development standards, including parking, setbacks, height and other standards to better enable compact, well-designed multi-family product types.

The proposed Housing Element update also includes a program to create pre-approved ADU plans, and to pursue zoning updates that facilitate infill development in the form of small lot subdivision and missing middle housing.


Comment #5: *The housing element does not promote new housing opportunities on parcels where apartments are currently banned, even near the planned NoHo-Pasadena busway. Instead, it concentrates lower-income housing opportunities in areas with significant noise and air pollution exposure. This approach fails to affirmatively further fair housing and reverse existing patterns of residential segregation.*

As specified by HCD guidance, the AFFH requirement is based on the Tax Credit Allocation Committee maps that show the locations of High Resource and Highest Resource communities within each jurisdiction to identify areas of opportunity. AFFH requires cities with high resource neighborhoods to locate lower income housing opportunities equitably and predominately within the areas of High and Highest Resource. As discussed in the AFFH Appendix to the Housing Element update, the opportunity sites are located predominately in High and Highest Resource census tracts, with a couple sites located in moderate resource tracts, per the TCAC maps. As noted by AH, HCD recently released additional guidance information and the City will be able to receive feedback from HCD regarding compliance with this requirement. The census tract to the immediate east of the Hollywood Burbank Airport within the Golden State district, where several opportunity sites are identified, is also identified as a disadvantaged community per the CalEnviro Screen analysis conducted as part of the Environmental Justice component of the GP update, in that this area is exposed to relatively higher degree of exposure to noise and air pollution. Although the AFFH requirement is related to the TCAC maps for areas of opportunity, the Safety Element update being prepared in conjunction with the 6th cycle Housing Element includes Environmental

Justice policies aimed at addressing these environmental hazards by investing in infrastructure improvements through the Golden State Specific Plan; incorporating project design features such as fixed windows, open space, increased tree plantings and higher MERV rated air filtration systems; and making use of the City's Complete Our Streets Plan to help evaluate streetscape design for new projects that considers all modes of transportation with the goal of providing safe and accessible travel to all individuals.

Again, we appreciate the input that Abundant Housing LA has provided to date and look forward to continuing the conversation. If you have questions, please contact me at FRamirez@burbankca.gov or 818-238-5250.

Regards,



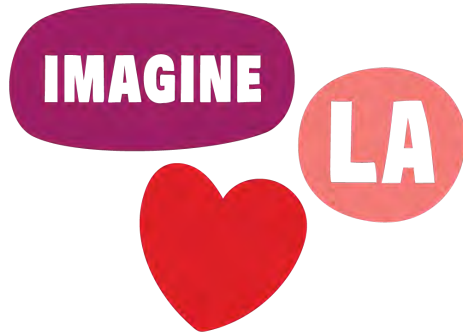
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Paul McDougall, Housing Policy Development Manager, HCD
Divya Ram, Housing Policy Specialist, HCD



[Read about the coalition here](#)





ABUNDANT HOUSING LA



August 27, 2021

Burbank City Council
Burbank City Hall
275 E. Olive Avenue
Burbank, CA 90512

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Burbank's general plan. We are writing on behalf of the **Our Future LA Coalition** regarding the 6th Cycle housing element update.

Why does this matter? Because we face a cascade of housing crises in our region. And while nearly everyone in Los Angeles County feels the crush of our housing crisis, Black and Latino residents feel it more than most:

- Black households have 1.12% the wealth of white households, and Latino households less than 5% (Federal Reserve Bank of San Francisco)
- Black people make up 8% of the county population, but 33.7% of people experiencing homelessness (LAHSA)
- Even under COVID-related eviction moratoriums, Black and Latino neighborhoods face disproportionately higher eviction threats (Los Angeles Times, UCLA)

These are the effects of decades of racist policies that we have not eradicated: Restrictive covenants, exclusionary zoning, and redlining made it impossible for Black families to build wealth through homeownership, and result in lower homeownership and higher rents today. The California Constitution's Article 34 and local "crime-free housing" policies put roadblocks in the way of addressing racial divisions in Californians' housing affordability and security.

This impact was felt devastatingly during the pandemic, when essential workers living in overcrowded housing were exposed to COVID at work and had no choice but to expose their families at home, leading to disproportionate deaths among Black and Latino people. Neighborhoods in South and Southeast LA, where nearly 20% of homes are overcrowded (defined as more than one person per room) had COVID rates of roughly 14,000 cases per 100,000 people. Neighborhoods on the Westside, where less than 5% of homes are overcrowded, had rates well under 5,000 cases per 100,000 people.¹ Death rates were similarly disproportionate -- at a time (January 2021) when the city of Beverly Hills was reporting 21 COVID deaths, and the neighborhood of Brentwood 9, the city of Compton reported 147, and the neighborhood of Westlake 202.² In all, COVID-19 mortality rates in LA County were roughly twice as high for Black people (31 deaths/100,000 individuals) and Latinos (29/100K) as for whites (15/100K) (from CGLA).

Of the 3,007 counties in the United States, L.A. County ranks last in housing affordability, overcrowding, and unsheltered homelessness. We are not doing enough to preserve and create homes for working class and lower-income people. The affordable housing crisis, rampant speculation, and housing shortage have gotten so bad that lower-income Black and Latino families are being pushed out of their homes and communities at an alarming rate. At the rate we're going, next generations won't be able to live in Los Angeles County.

Los Angeles County is legally required to build 341,000 affordable homes by 2030. [To truly address our needs, we need more than double that.](#) At the rate we're going today, we might build 25,000. That's 7% of what's needed. That kind of failure will fall hardest on Black and Latino families, who disproportionately face eviction, homelessness and having to choose between rent and food. Our Future LA demands we not let that happen.

¹ ["When coronavirus invaded their tiny apartment, children desperately tried to protect dad", LA Times, 1/29/21](#)

² ["We Are Forced to Live in These Conditions': In Los Angeles, Virus Ravages Overcrowded Homes", NY Times, 1/23/21](#)

In order to create a better housing future, we must make every neighborhood resource-rich so people can live where they want to live and don't have to leave their community to find opportunity. We must also achieve equitable land use and zoning so that we open-up new areas to greater density and value capture, while also ensuring that areas already zoned for density are protected from environmental and spatial racism. As the region plans for growth, there must be no conversion of wildlife habitat to housing or further development in wildfire hazard areas, as identified by CalFire. We understand that the City cares deeply about these issues, and we hope to offer assistance in addressing them.

As it stands right now, the draft housing element will not meet Burbank's goals around equity and affordability. We submit these comments in the spirit of collaboration in order to partner and provide research, grounded data to help in meeting housing needs. We are interested in having a meeting to discuss these comments more.

Our Future LA Housing Element Comments

1. Protections and preservation

A. The housing element must do more to prioritize rezoning in transit-rich, job-rich, and high-resource neighborhoods, including single-family zoned areas. This is necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.

B. The housing element should expand just-cause eviction protections to cover all tenants and establish a corresponding enforcement program.

C. The housing element should implement a local RSO or strengthen/reduce the annual allowable rent increase for the existing RSO program.

D. The housing element should codify a tenant's right to counsel in an eviction proceeding.

E. The housing element should strengthen its permanent tenant education program to inform tenants of their rights and how to access eviction defense resources.

F. The housing element should exclude parcels containing RSO housing units in the housing element's site inventory.

G. The housing element should require that no net loss provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.

H. The housing element should institute local programs and funding sources for preservation of existing affordable housing.

2. Prioritization of affordable housing

- A. The housing element should utilize a value capture mechanism, such as inclusionary zoning, to locally fund and/or incentivize affordable housing.
- B. The housing element should prioritize creation of affordable housing on public land.
- C. The housing element should streamline affordable housing production.
- D. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas.
- E. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas currently zoned R1.

3. Site Capacity Assessment

- A. The housing element should estimate and report both the likelihood of development and the net new units if developed of inventory sites, both vacant and nonvacant.

Comparison of claimed capacity vs. estimated realistic capacity

Income Category	RHNA Target	Claimed Capacity in Draft HE	NNL Buffer	Estimated Realistic Capacity in Draft HE	Recommended Realistic Capacity w/20% NNL	Realistic Capacity Gap
VLI + LI	3,971	4,212	6%	505	4,765	-4,260
MI	1,409	1,512	7%	181	1,691	-1,509
AMI	3,392	4,219	24%	506	4,070	-3,564
Total	8,772	9,943	13%	1,193	10,526	-9,333

We estimate that the draft housing element will fall short of the RHNA goal, by 9,333 units of realistic capacity. The City must *fairly* estimate the likelihood of development for all parcels on the suitable sites inventory.

- B. The housing element should report the proportion of sites from the previous housing element’s inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources should be used in order to conduct a thorough “factors” analysis of sites’ realistic development capacity.

C. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but should use statistical methods (e.g. surveying a random sample of owners of nonvacant sites) to determine that the sites' existing uses are likely to be discontinued during the planning period.

D. A buffer of at least 15-30% extra capacity should be included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target.

See No Net Loss (NNL) section of 3A.

E. The housing element should provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and should adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.

F. The housing element should commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.

4. Affirmatively Furthering Fair Housing

A. The housing element should meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low.

B. The housing element should meaningfully reduce the concentration of lower-income households in areas with significant exposure to noise/pollution.

C. The housing element should include a thorough analysis of local patterns in socioeconomic/racial segregation and integration, including patterns of overt racial or ethnic discrimination in the housing and land development market.

D. The housing element should adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities.

E. The housing element should adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

F. The jurisdiction should adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup.

5. Forecasts of ADU Development

A. The housing element should use an HCD-recommended safe harbor methodology for forecasting future ADU production.

B. The housing element should provide for mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be large enough to make up for an ADU shortfall.

C. The housing element should assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

[Our Future LA](#)
[Steering Committee Members](#)

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD



September 29, 2021

Burbank City Council
Burbank City Hall
275 E. Olive Avenue
Burbank, CA 90512

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of the City of Burbank's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding the 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law.

We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

In May 2021, [we submitted a comment letter](#) regarding the City's draft housing element update. In the letter, we highlighted significant inconsistencies with state housing element law, including the requirement that housing element updates affirmatively further fair housing (AFFH), as well as inconsistencies with the State Department of Housing and Community Development (HCD)'s instructions regarding housing element design and implementation.

HCD's [recent comment](#) letter on the City's draft housing element update directly addresses many of the same deficiencies that our letter highlighted, and also states that "revisions will be necessary to comply with State Housing Element Law."¹ We have provided a brief summary below (Exhibit A) illustrating how HCD's comments on the City's draft housing element are largely congruent with our previous analysis.

These deficiencies must be addressed in the final version of the housing element update. We urge the City to swiftly adopt a legally compliant housing element that accommodates the City's RHNA target and provides a variety of attainable housing options for the City's residents and workers.

Thank you for your time and consideration.

Sincerely,

¹ August 17, 2021 HCD Letter to the City of Burbank, pg. 1

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

Exhibit A: Comparison of HCD Comment Letter and AHLA/YIMBY Law and Policy Recommendations

Deficiency	HCD Comment Letter Appendix	AHLA/YIMBY Law Comment Letter	AHLA/YIMBY Law Policy Recommendations
<p>Insufficient AFFH analysis and policy reforms to promote integrated neighborhoods</p>	<p>Page 9: “As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For example, Program 3: Preserve and Protect Existing Tenants and Housing, states that implementation will address tenant protection. However, the program should be expanded to describe why and how this program will address inequities through listing specific deliverables, objectives, and metrics. All programs need to be reviewed to incorporate meaningful actions.”</p> <p>Page 2: “Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. [...] Currently, the element identifies several programs to address fair housing issues. However, to facilitate meaningful change and address AFFH requirements, the element will need to add or revise/expand programs to demonstrate how it addresses fair housing issues..”</p> <p>Pages 1-2: “The element needs to include complete local and regional data on integration and segregation for the City and analyze it for both local and regional</p>	<p>Page 8: “Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households away from high-cost, high-opportunity cities.</p> <p>To this day, apartments are banned on 80% of the residentially-zoned land in Burbank. The median home sale price in Burbank was \$755,000 in 2018, and 54% of the city’s renters are “rent-burdened” (i.e. they spend more than 30% of their income on rent). This denies historically disadvantaged groups housing opportunities near job centers, quality schools, and other public resources, a situation that persists today.</p> <p>The City is obligated to promote fair housing opportunities and undo patterns of segregation. Burbank should follow HCD’s recommendation that cities distribute lower-income housing opportunities throughout the city, and recommends that cities first identify development potential for lower-income housing in high-opportunity neighborhoods.</p>	<p>The City should rezone all residential areas within a 10-minute walk of busway stations for apartments at Downtown densities, and rezone commercially-zoned land for mixed-use development, with loosened parking, setback, open space and height requirements.</p> <p>Do more to reduce the concentration of lower-income households in neighborhoods with high concentrations of low- and moderate-income households.</p> <p>Identify new funding sources and public resources to encourage the production and preservation of affordable housing, such as a real estate transfer tax, an introduction of congestion pricing, creation of a local density bonus program, and active abatement of unhealthy facilities, such as pumping stations, incinerators, and other polluting infrastructure.</p> <p>Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning to prevent displacement of vulnerable households.</p>

	<p>trends and patterns. [...] The element needs to be revised to include local and regional data on areas of affluence and analyze this data for trends and patterns. The element should also provide an updated map and analysis on racial and ethnic distribution and poverty.”</p> <p>Page 2: “However, the accompanying analysis shall also be reflective of housing development at all income-levels and evaluate the sites relative to socio-economic patterns. The site inventory analysis should address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group and should be supported by local data and knowledge.”</p>	<p>This would mean rezoning more parcels, including residential parcels currently zoned single-family only, to encourage enough housing growth to achieve the RHNA target in full.”</p>	<p>Ensure that “no net loss” provisions apply to parcels in the site inventory and rezoning program with an annual and ongoing monitoring and implementation program.</p> <p>Prioritize the production of affordable housing on publicly-owned land, and offer that land to nonprofit developers at no cost as a lawful and bona fide concession through state density bonus law.</p> <p>Create a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.</p>
<p>Poor site suitability and failure to analyze likelihood of discontinuation for nonvacant sites</p>	<p>Page 2: “While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also needs to analyze the likelihood that the identified units will be developed as noted in the</p>	<p>Page 2: “Planning’s analysis identifies 12 sites in Burbank’s Downtown and 7 sites in the Golden State Specific Plan, totaling 95.7 acres and containing theoretical zoned capacity for about 6,100 housing units. However, Planning does not estimate the likelihood of development for these parcels. Instead, Planning only provides a cursory discussion of why these sites may be good candidates for redevelopment, without providing quantitative evidence or analysis. Although Planning claims “property owner and/or developer interest in acquiring and assembling underdeveloped parcels into larger</p>	<p>Provide a quantitative estimate of parcels’ development probabilities, and incorporate this factor into the estimate of sites’ realistic capacity. Valid methodologies include the Survey Method or the Historical Redevelopment Rate Method.</p> <p>Report the proportion of sites in the previous housing element’s inventory that were developed during the planning period.</p> <p>Share letters from owners of the site inventory parcels, indicating their interest in selling or redeveloping these properties during the 6th Cycle.</p>

	<p>inventory in zones that allow nonresidential uses (e.g., mixed-use)..”</p> <p>Page 4: “In addition, the element should clearly identify the degree of reliance on nonvacant sites to accommodate the housing need for lower-income households. Please be aware that relying on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.”</p> <p>Page 4: “The site inventory identifies small sites to accommodate the City’s lower-income RHNA. Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element should provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation, such as common ownership. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City’s lower-income housing need. Based on a complete analysis, the City should consider adding or revising programs to include incentives for facilitating development on small sites.”</p>	<p>development sites”, Planning did not share any letters from property owners indicating their interest in selling or redeveloping these sites.</p> <p>Per HCD guidelines, if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites (as Burbank does), the jurisdiction must make findings supported by “substantial evidence” that the sites’ existing uses are “likely to be discontinued during the planning period.” Planning did not follow this instruction, which is a requirement under Assembly Bill 1397.”</p> <p>Page 3: “Housing production data from the 5th cycle further casts doubt on Planning’s implicit assumption that all 19 sites will be redeveloped by 2029. At the outset of the 5th cycle, Burbank claimed a theoretical capacity of roughly 5,573 more housing units. Through 2019, Burbank permitted 501 housing units, which equates to 668 housing units permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues through 2021). This implies that in Burbank, excess zoned capacity has a 12% likelihood of being developed (668 actual units divided by 5,573 theoretical units).”</p>	<p>Remove parcels from the site inventory where redevelopment is unlikely to occur during the 6th Cycle.</p> <p>Commit to a mid-cycle review to verify Planning’s assumptions about development probabilities. If it turns out that sites within a tier, or category, were developed at a lower-than-expected rate during the first half of the cycle, then the city should rezone for additional capacity or make other appropriate adjustments for the second half of the planning period.</p> <p>If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely.</p>
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	<p>Page 7: “As noted in the Finding B4, the element does not include a complete sites inventory or analysis; as a result, the adequacy of sites and zoning has not been established. Based on the results of a complete sites inventory and analysis, programs may need to be added, or revised, to address a shortfall of sites and zoning for a variety of housing types.”</p>		
<p>Failure to estimate realistic capacity for residential development in Specific Plan areas</p>	<p>Page 4: “The element identifies a large portion of its RHNA at all income levels on nonvacant sites including sites that will be rezoned to address the 6th cycle shortfall (page 1-66). The analysis mentioned a list of factors that were considered to determine development potential including age of structures and degree of underutilization. However, the element must include a complete analysis demonstrating the potential for redevelopment of nonvacant sites including the extent to which existing uses may constitute an impediment to additional residential development. The element could include the City’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.”</p>	<p>Page 4: “We disagree with Planning’s contention that all 19 sites will all be redeveloped by 2029. For example, the Site Assessment assumes that all four acres of Golden State Specific Plan block No. 1 (Lima/Avon) will be built out at the density of Downtown Burbank (84 units per acre), producing 334 homes. However, this block is entirely occupied by a variety of light industrial businesses, including the popular Lincoln Beer Company. Planning provided no evidence that the site is nonviable as industrial land, or that the various property owners intend to sell.”</p> <p>Page 4: “While the City may count permitted or entitled units towards its 6th Cycle RHNA goals, it must realistically estimate how many of these units will ultimately be built during the 6th Cycle, based on recent historical data. The City of Los Angeles’ Initial Study counted active planning entitlements, approved planning entitlements with no building permit, and permitted</p>	<p>Provide a quantitative estimate of parcels’ development probabilities, adjusted for the expected mix of residential vs. commercial development, and incorporate this factor into the estimate of sites’ realistic capacity.</p> <p>Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly. If the City does not have these data, it should apply the same discount as the City of Los Angeles due to the close proximity and microeconomic conditions that exist there.</p>

		<p>projects that have not yet been completed towards its 6th Cycle RHNA goals, but discounted each category based on the share of proposed units expected to be built, using the City's historical data.</p> <p>Planning must incorporate a similar estimate into its Inventory Analysis. Using data from recent projects, the City of Los Angeles estimated that 37% of projects with pending entitlements, 45% of projects with approved entitlements, and 79% of permitted projects, are ultimately completed."</p>	
<p>Lack of concrete constraint removal and adequate rezoning program</p>	<p>Page 9: "As noted in Finding B5 the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints."</p> <p>Pages 5-6: "[T]he City's Growth Management Ordinance includes information on its purpose and analysis on constraints (page 1-49). However, the analysis should include the current number of units vs. units built out considering the RHNA. Furthermore, the element notes "the maximum allowed number of residential units beyond the approved maximum build out in the 1988 Land Use Element without voter approval" and that City Council extended Measure 1 to January 1, 2030. The Housing Crisis Act of 2019 (SB 330, 2019) [...] generally</p>	<p>Pages 5-6: "Building housing in Burbank is difficult, expensive, and time-consuming. Development timelines are long, with an average time of 12-16 months for multifamily project approval. Mixed-use projects take even longer, requiring a 3-4 year approval process and a conditional use permit (for which approval can take 12-16 months alone). This process is a major impediment to housing production.</p> <p>[...]</p> <p>Housing element law requires cities to provide an analysis of constraints on housing development, as well as a program to mitigate or remove these constraints. While the Draft Housing Element discusses constraints in detail, including long</p>	<p>Create a high-quality local density bonus program, which would also apply to low-density parcels where apartments are banned today.</p> <p>Pre-approve standard accessory dwelling unit (ADU), small-scale "missing middle" multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.</p> <p>Speed up the timeline for ministerial review, and expand ministerial review to apply to more projects.</p> <p>Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.</p>

	<p>prohibits a locality from enacting a development policy, standard or condition that reduces intensity, imposes moratoriums, enforces subjective design standards, or implements any provision that limits approvals or caps population. [...] The City should evaluate consistency with these requirements and if necessary, immediately void or suspend the annual growth cap.”</p> <p>Page 6: “The element must describe all required fees for single family and multifamily housing development, [...] and then, the element must analyze their impacts as potential constraints on housing supply and affordability.”</p> <p>Page 6: “<u>Local Processing and Permit Procedures</u>: The element states that a community meeting is required for multifamily projects (page 1-58). The element should describe and analyze how this meeting relates to the approval of the project, if the community meeting is required for both discretionary and non-discretionary projects, and any impacts to the project in terms of cost and approval certainty. In addition, the element should describe the City’s SB 35 (Chapter 366, Statutes of 2017) streamline ministerial approval process and application.</p> <p>Page 7: “As the element relies on consolidated small sites to accommodate the RHNA for lower-income households, it should include a program(s) to facilitate lot consolidation and development of housing</p>	<p>approval timelines, strict limits on building size, high construction costs, and a lack of local funding for affordable housing production, the report does not commit to a strong enough program to remove policy constraints that deter housing production.”</p>	<p>Reduce restrictions on maximum height, floor-area ratio, unit size, setbacks, and lot coverage.</p> <p>Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.</p> <p>Reduce fees on multifamily residential development.</p> <p>Eliminate the conditional use permit requirement for mixed-use development.</p>
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	<p>on small sites. For example, the program could commit to (1) granting density bonuses above state density bonus law (Gov. Code, § 65915.); (2) deferring fees specifically for consolidation; (3) expediting permit processing; (4) identifying and targeting specific financial resources; and, (5) modifying development standards.”</p>		
<p>Unrealistic forecast of future ADU development</p>	<p>Page 5: “The element assumes an ADU buildout of 200 ADUs per year for a potential buildout of 1,600 units within the planning period. Given that the City has permitted 54 ADUs in 2018, 110 in 2019, 97 in 2020, and 179 in the first 6 months of 2021 (for an average of 98 units per year), it is not clear if a production level of 200 ADUs per year will be achievable over the planning period. As a result, the element should be updated to include a realistic estimate of potential ADU production.</p>	<p>Page 5: “Burbank issued permits for 54 ADUs in 2018, 110 ADUs in 2019, and 112 ADUs in 2020. Under a correct calculation of HCD’s “Option #1”, Burbank would take the average of the ADU permitting trend between 2018 and 2020, and forecast that 92 ADUs will be permitted per year during the 6th Cycle. This would allow for a total 6th cycle forecast of 736 ADUs.</p> <p>However, Planning counts 1,600 ADUs, or 200 ADUs per year, towards the City’s RHNA target. Planning contends that a small reduction in processing fees, expedited application review, and pre-approved ADU plans will lead to a doubling in the number of ADUs permitted annually going forward. But Planning provides no tangible evidence that these relatively minor incentives will yield this outcome.”</p>	<p>Use HCD’s Option 1 safe harbor, and project that 736 ADUs will be permitted during the 6th Cycle.</p> <p>Follow HCD’s recommendation to track ADU and JADU creation and affordability levels, and commit to a review at the planning cycle midpoint to evaluate if production estimates are being achieved.</p>



December 16, 2021

Burbank City Council
Burbank City Hall
275 East Olive Avenue
Burbank, CA 91502

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Burbank's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding the 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law.

We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

In May 2021, we [submitted a comment letter](#) regarding Burbank's draft housing element update. In the letter, we highlighted significant inconsistencies with state housing element law, including the requirement that housing element updates affirmatively further fair housing (AFFH), as well as inconsistencies with the State Department of Housing and Community Development (HCD)'s instructions regarding housing element design and implementation.

In September 2021, we also [submitted a comment letter](#) demonstrating significant alignment between our May comments and HCD's review of the City's draft housing element update. Our September letter includes a brief summary (included in this letter as Appendix A) illustrating how HCD's comments on the City's draft housing element are largely congruent with our previous analysis. We agreed with HCD's finding that "revisions will be necessary to comply with State Housing Element Law."¹

We are disappointed that the latest version of the City's housing element update does not meaningfully fix the deficiencies identified in our earlier comments or in HCD's review and comments. The City's housing element is inconsistent with HCD's instructions, does not comply with the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686, and does not comply with Government Code Section 65583(c)'s requirement that housing elements include programs with concrete action steps to facilitate housing production.

¹ HCD, Review of the City of Burbank's 6th Cycle (2021-2029) Draft Housing Element Update, 8/17/21, pg. 1

The following issues that we raised earlier this year remain unaddressed:

- 1. Planning's process for selecting sites and assessing their capacity does not accurately estimate parcels' likelihood of development or net new units if redeveloped. Therefore, Planning has not identified enough sites where 8,750 homes will realistically be developed by 2029.*
- 2. Planning assumes that 2,180 housing units that were approved or pending approval during the 5th Cycle will be built during the 6th Cycle, without accounting for the near-certainty that some projects will never be built.*
- 3. Planning makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies, without providing evidence to support this claim.*
- 4. Planning did not propose adequate reforms to address the major constraints on redevelopment that exist in Burbank.*
- 5. The housing element does not promote new housing opportunities on parcels where apartments are currently banned, even near the planned NoHo-Pasadena busway. Instead, it concentrates lower-income housing opportunities in areas with significant noise and air pollution exposure. This approach fails to affirmatively further fair housing and reverse existing patterns of residential segregation.*

We also wish to raise the following issues that are specific to this latest draft:

AB 1397 Compliance

Under Assembly Bill 1397, when cities allocate over 50% of their lower-income RHNA targets to nonvacant sites (as Burbank does), they must demonstrate through **substantial evidence** that the current use of these sites is likely to be discontinued during the planning period.

While AB 1397 and HCD's existing guidance require cities to provide substantial evidence of nonvacant sites' likely discontinuation, cities have many options available to them for **how** to assess nonvacant site capacity. For example, cities could communicate with the owners of site inventory parcels, to find out whether they plan to redevelop their property into housing. Cities can survey a random, representative sample of property owners to estimate the overall likelihood that a site's existing use will discontinue in the near future. Cities can calculate the share of properties associated with permits for demolition, change of use, or redevelopment over the past few years, in order to estimate an overall likelihood of site discontinuation.

The proposed housing element relies on a relatively short list of 19 "Opportunity Sites" for most of the City's anticipated housing growth during the 6th Cycle, many of which are zoned for commercial uses and currently host businesses. Given that some of these businesses may be operating under long-term leases, and given that commercially-zoned sites can be redeveloped into uses other than 100% residential structures, it's especially important for cities to provide

strong evidence that these sites are likely to be redeveloped into residential or mixed-use developments.

Unfortunately, the City does not provide this evidence, nor does it attempt to estimate a likelihood of discontinuation based on recent redevelopment trends. Appendix D of the housing element provides information about each of the 19 Opportunity Sites, including whether city staff has spoken to the property's owners about their interest in redeveloping the site, the current building's age and use, and the building's current value relative to the value of the land.

While this information is useful for identifying sites that have a reasonable chance at being redeveloped in the future, **this is not the same as providing firm evidence that redevelopment is likely to occur by 2029.** Of course, planners are unable to predict with certainty whether a site will be redeveloped in the near future, which is why experts recommend that cities' housing elements provide theoretical zoned capacity equivalent to a multiple of the RHNA target. This is the approach [used in the City of Los Angeles' housing element](#).

Additionally, the City has included multiple Opportunity Sites where redevelopment is far from likely. For example:

- **TOD 3 (potential for 23 homes)** is a collection of lots, including a large parcel owned by Caltrans, two restaurants, and a gas station. While City staff “has been engaged with Caltrans and the adjacent property owners about the viability of redeveloping these parcels as a cohesive mixed-use project”², the housing element does not say when these discussions took place, or whether the owners of these properties are interested in selling their parcels to a single owner. Development projects that involve combining multiple parcels with different owners are often challenging, especially when the owner of the largest parcel is a state agency. While this project is certainly possible, it is far from a certainty.
- **TOD 7 (potential for 379 homes)** is the Civic Center's parking lots, owned by the City of Burbank. The City has not made a clear commitment to allowing the redevelopment of these sites, and redevelopment of publicly-owned land, while certainly possible, should not be treated as a sure thing.
- **TOD 8 (potential for 88 homes)** is fully occupied by a variety of small businesses. While the City states that “staff had previous discussions with the property owner about the redevelopment of this opportunity site as a residential/mixed use project”³, the City doesn't say when these discussions took place, or whether the owner is interested in redevelopment.

The City must present solid evidence that the owners of site inventory parcels (especially those with existing businesses and leases) are interested in redevelopment, and must discount sites by their likelihood of discontinuation. The City must also include additional parcels on their site inventory in order to achieve the RHNA target, which will likely necessitate rezoning.

² Burbank Housing Element, Appendix D, November 2021, pg. D-16

³ Burbank Housing Element, Appendix D, November 2021, pg. D-21

Fair Housing Issues and AFFH Compliance

The latest version of the housing element provides additional detail on fair housing issues in Burbank, including segregation patterns, displacement risk, and major disparities in access to high-opportunity neighborhoods. This updated AFFH section includes detailed data, maps, and qualitative analysis explaining these issues and describing their impact in Burbank.

However, the housing element's proposed actions to actually encourage more housing opportunities in high-resource areas, a necessary component for AFFH compliance, are weak. As we described in Issue #1 of our May letter, the City's proposed sites inventory does not provide "substantial evidence" that discontinuation of the sites' existing uses is likely, does not provide evidence that the sites' owners are interested in redevelopment, and includes several large commercial sites where residential redevelopment is far from a sure thing. As we described in Issue #4 of our May letter, the City's housing element would do little to relieve the severe constraints on homebuilding (separate from restrictive zoning) that have made housing difficult to build in Burbank.

While the housing element includes a map of the sites inventory overlaid over census tracts' TCAC designations, indicating that most sites inventory parcels are located in census tracts categorized as High Resource TCAC, this matters little if, as is likely, many of these sites are not redeveloped during the 6th cycle.

Additionally, the updated housing element failed to include policies that would encourage denser development on R1-zoned parcels, even near the future NoHo-Pasadena busway, a shortcoming that we raised in Issue #5 of our June letter. This helps to explain why only 3 out of the 19 Opportunity Sites are located in census tracts with Highest Resource TCAC designations,⁴ since R1 zoning predominates in these tracts.

Ending exclusionary zoning is necessary for the housing element to advance socioeconomic integration and greater housing affordability. The final housing element must make a stronger effort to affirmatively further fair housing by rezoning sites in low-density, high-resource areas of Burbank, particularly near transit corridors. This is necessary to ensure that sufficient housing opportunities, available at all levels of income, are created citywide, including in Highest Resource areas.

Once again, we remind you that Burbank has a legal obligation to sufficiently plan to meet current and future residents' housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. Concerned residents and equity advocates have consistently highlighted the above issues, and we believe that Burbank is not on a path to fulfilling its legal obligation.

⁴ Burbank Housing Element, Appendix B, November 2021, pg. B-45

We urge the City to swiftly adopt a legally compliant housing element that accommodates the City's RHNA target and provides a variety of attainable housing options for the City's residents and workers.

Thank you for your time and consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

Appendix A: Comparison of HCD Comment Letter and AHLA/YIMBY Law Comment Letter and Policy Recommendations

Deficiency	HCD Comment Letter Appendix	AHLA/YIMBY Law Comment Letter	AHLA/YIMBY Law Policy Recommendations
<p>Insufficient AFFH analysis and policy reforms to promote integrated neighborhoods</p>	<p>Page 9: “As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For example, Program 3: Preserve and Protect Existing Tenants and Housing, states that implementation will address tenant protection. However, the program should be expanded to describe why and how this program will address inequities through listing specific deliverables, objectives, and metrics. All programs need to be reviewed to incorporate meaningful actions.”</p> <p>Page 2: “Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. [...] Currently, the element identifies several programs to address fair housing issues. However, to facilitate meaningful change and address AFFH requirements, the element will need to add or revise/expand programs to demonstrate how it addresses fair housing issues..”</p> <p>Pages 1-2: “The element needs to include complete local and regional data on integration and segregation for the City and analyze it for both local and regional</p>	<p>Page 8: “Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push housing opportunities for lower-income households away from high-cost, high-opportunity cities.</p> <p>To this day, apartments are banned on 80% of the residentially-zoned land in Burbank. The median home sale price in Burbank was \$755,000 in 2018, and 54% of the city’s renters are “rent-burdened” (i.e. they spend more than 30% of their income on rent). This denies historically disadvantaged groups housing opportunities near job centers, quality schools, and other public resources, a situation that persists today.</p> <p>The City is obligated to promote fair housing opportunities and undo patterns of segregation. Burbank should follow HCD’s recommendation that cities distribute lower-income housing opportunities throughout the city, and recommends that cities first identify development potential for lower-income housing in high-opportunity neighborhoods.</p>	<p>The City should rezone all residential areas within a 10-minute walk of busway stations for apartments at Downtown densities, and rezone commercially-zoned land for mixed-use development, with loosened parking, setback, open space and height requirements.</p> <p>Do more to reduce the concentration of lower-income households in neighborhoods with high concentrations of low- and moderate-income households.</p> <p>Identify new funding sources and public resources to encourage the production and preservation of affordable housing, such as a real estate transfer tax, an introduction of congestion pricing, creation of a local density bonus program, and active abatement of unhealthy facilities, such as pumping stations, incinerators, and other polluting infrastructure.</p> <p>Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning to prevent displacement of vulnerable households.</p>

	<p>trends and patterns. [...] The element needs to be revised to include local and regional data on areas of affluence and analyze this data for trends and patterns. The element should also provide an updated map and analysis on racial and ethnic distribution and poverty.”</p> <p>Page 2: “However, the accompanying analysis shall also be reflective of housing development at all income-levels and evaluate the sites relative to socio-economic patterns. The site inventory analysis should address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group and should be supported by local data and knowledge.”</p>	<p>This would mean rezoning more parcels, including residential parcels currently zoned single-family only, to encourage enough housing growth to achieve the RHNA target in full.”</p>	<p>Ensure that “no net loss” provisions apply to parcels in the site inventory and rezoning program with an annual and ongoing monitoring and implementation program.</p> <p>Prioritize the production of affordable housing on publicly-owned land, and offer that land to nonprofit developers at no cost as a lawful and bona fide concession through state density bonus law.</p> <p>Create a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.</p>
<p>Poor site suitability and failure to analyze likelihood of discontinuation for nonvacant sites</p>	<p>Page 2: “While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also needs to analyze the likelihood that the identified units will be developed as noted in the</p>	<p>Page 2: “Planning’s analysis identifies 12 sites in Burbank’s Downtown and 7 sites in the Golden State Specific Plan, totaling 95.7 acres and containing theoretical zoned capacity for about 6,100 housing units. However, Planning does not estimate the likelihood of development for these parcels. Instead, Planning only provides a cursory discussion of why these sites may be good candidates for redevelopment, without providing quantitative evidence or analysis. Although Planning claims “property owner and/or developer interest in acquiring and assembling underdeveloped parcels into larger</p>	<p>Provide a quantitative estimate of parcels’ development probabilities, and incorporate this factor into the estimate of sites’ realistic capacity. Valid methodologies include the Survey Method or the Historical Redevelopment Rate Method.</p> <p>Report the proportion of sites in the previous housing element’s inventory that were developed during the planning period.</p> <p>Share letters from owners of the site inventory parcels, indicating their interest in selling or redeveloping these properties during the 6th Cycle.</p>

	<p>inventory in zones that allow nonresidential uses (e.g., mixed-use)..”</p> <p>Page 4: “In addition, the element should clearly identify the degree of reliance on nonvacant sites to accommodate the housing need for lower-income households. Please be aware that relying on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.”</p> <p>Page 4: “The site inventory identifies small sites to accommodate the City’s lower-income RHNA. Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element should provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation, such as common ownership. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City’s lower-income housing need. Based on a complete analysis, the City should consider adding or revising programs to include incentives for facilitating development on small sites.”</p>	<p>development sites”, Planning did not share any letters from property owners indicating their interest in selling or redeveloping these sites.</p> <p>Per HCD guidelines, if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites (as Burbank does), the jurisdiction must make findings supported by “substantial evidence” that the sites’ existing uses are “likely to be discontinued during the planning period.” Planning did not follow this instruction, which is a requirement under Assembly Bill 1397.”</p> <p>Page 3: “Housing production data from the 5th cycle further casts doubt on Planning’s implicit assumption that all 19 sites will be redeveloped by 2029. At the outset of the 5th cycle, Burbank claimed a theoretical capacity of roughly 5,573 more housing units. Through 2019, Burbank permitted 501 housing units, which equates to 668 housing units permitted by the end of the 5th cycle (assuming that the same annual permitting pace continues through 2021). This implies that in Burbank, excess zoned capacity has a 12% likelihood of being developed (668 actual units divided by 5,573 theoretical units).”</p>	<p>Remove parcels from the site inventory where redevelopment is unlikely to occur during the 6th Cycle.</p> <p>Commit to a mid-cycle review to verify Planning’s assumptions about development probabilities. If it turns out that sites within a tier, or category, were developed at a lower-than-expected rate during the first half of the cycle, then the city should rezone for additional capacity or make other appropriate adjustments for the second half of the planning period.</p> <p>If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely.</p>
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	<p>Page 7: “As noted in the Finding B4, the element does not include a complete sites inventory or analysis; as a result, the adequacy of sites and zoning has not been established. Based on the results of a complete sites inventory and analysis, programs may need to be added, or revised, to address a shortfall of sites and zoning for a variety of housing types.”</p>		
<p>Failure to estimate realistic capacity for residential development in Specific Plan areas</p>	<p>Page 4: “The element identifies a large portion of its RHNA at all income levels on nonvacant sites including sites that will be rezoned to address the 6th cycle shortfall (page 1-66). The analysis mentioned a list of factors that were considered to determine development potential including age of structures and degree of underutilization. However, the element must include a complete analysis demonstrating the potential for redevelopment of nonvacant sites including the extent to which existing uses may constitute an impediment to additional residential development. The element could include the City’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.”</p>	<p>Page 4: “We disagree with Planning’s contention that all 19 sites will all be redeveloped by 2029. For example, the Site Assessment assumes that all four acres of Golden State Specific Plan block No. 1 (Lima/Avon) will be built out at the density of Downtown Burbank (84 units per acre), producing 334 homes. However, this block is entirely occupied by a variety of light industrial businesses, including the popular Lincoln Beer Company. Planning provided no evidence that the site is nonviable as industrial land, or that the various property owners intend to sell.”</p> <p>Page 4: “While the City may count permitted or entitled units towards its 6th Cycle RHNA goals, it must realistically estimate how many of these units will ultimately be built during the 6th Cycle, based on recent historical data. The City of Los Angeles’ Initial Study counted active planning entitlements, approved planning entitlements with no building permit, and permitted</p>	<p>Provide a quantitative estimate of parcels’ development probabilities, adjusted for the expected mix of residential vs. commercial development, and incorporate this factor into the estimate of sites’ realistic capacity.</p> <p>Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly. If the City does not have these data, it should apply the same discount as the City of Los Angeles due to the close proximity and microeconomic conditions that exist there.</p>

		<p>projects that have not yet been completed towards its 6th Cycle RHNA goals, but discounted each category based on the share of proposed units expected to be built, using the City's historical data.</p> <p>Planning must incorporate a similar estimate into its Inventory Analysis. Using data from recent projects, the City of Los Angeles estimated that 37% of projects with pending entitlements, 45% of projects with approved entitlements, and 79% of permitted projects, are ultimately completed."</p>	
<p>Lack of concrete constraint removal and adequate rezoning program</p>	<p>Page 9: "As noted in Finding B5 the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints."</p> <p>Pages 5-6: "[T]he City's Growth Management Ordinance includes information on its purpose and analysis on constraints (page 1-49). However, the analysis should include the current number of units vs. units built out considering the RHNA. Furthermore, the element notes "the maximum allowed number of residential units beyond the approved maximum build out in the 1988 Land Use Element without voter approval" and that City Council extended Measure 1 to January 1, 2030. The Housing Crisis Act of 2019 (SB 330, 2019) [...] generally</p>	<p>Pages 5-6: "Building housing in Burbank is difficult, expensive, and time-consuming. Development timelines are long, with an average time of 12-16 months for multifamily project approval. Mixed-use projects take even longer, requiring a 3-4 year approval process and a conditional use permit (for which approval can take 12-16 months alone). This process is a major impediment to housing production.</p> <p>[...]</p> <p>Housing element law requires cities to provide an analysis of constraints on housing development, as well as a program to mitigate or remove these constraints. While the Draft Housing Element discusses constraints in detail, including long</p>	<p>Create a high-quality local density bonus program, which would also apply to low-density parcels where apartments are banned today.</p> <p>Pre-approve standard accessory dwelling unit (ADU), small-scale "missing middle" multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.</p> <p>Speed up the timeline for ministerial review, and expand ministerial review to apply to more projects.</p> <p>Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.</p>

	<p>prohibits a locality from enacting a development policy, standard or condition that reduces intensity, imposes moratoriums, enforces subjective design standards, or implements any provision that limits approvals or caps population. [...] The City should evaluate consistency with these requirements and if necessary, immediately void or suspend the annual growth cap.”</p> <p>Page 6: “The element must describe all required fees for single family and multifamily housing development, [...] and then, the element must analyze their impacts as potential constraints on housing supply and affordability.”</p> <p>Page 6: “<u>Local Processing and Permit Procedures</u>: The element states that a community meeting is required for multifamily projects (page 1-58). The element should describe and analyze how this meeting relates to the approval of the project, if the community meeting is required for both discretionary and non-discretionary projects, and any impacts to the project in terms of cost and approval certainty. In addition, the element should describe the City’s SB 35 (Chapter 366, Statutes of 2017) streamline ministerial approval process and application.</p> <p>Page 7: “As the element relies on consolidated small sites to accommodate the RHNA for lower-income households, it should include a program(s) to facilitate lot consolidation and development of housing</p>	<p>approval timelines, strict limits on building size, high construction costs, and a lack of local funding for affordable housing production, the report does not commit to a strong enough program to remove policy constraints that deter housing production.”</p>	<p>Reduce restrictions on maximum height, floor-area ratio, unit size, setbacks, and lot coverage.</p> <p>Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.</p> <p>Reduce fees on multifamily residential development.</p> <p>Eliminate the conditional use permit requirement for mixed-use development.</p>
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	<p>on small sites. For example, the program could commit to (1) granting density bonuses above state density bonus law (Gov. Code, § 65915.); (2) deferring fees specifically for consolidation; (3) expediting permit processing; (4) identifying and targeting specific financial resources; and, (5) modifying development standards.”</p>		
<p>Unrealistic forecast of future ADU development</p>	<p>Page 5: “The element assumes an ADU buildout of 200 ADUs per year for a potential buildout of 1,600 units within the planning period. Given that the City has permitted 54 ADUs in 2018, 110 in 2019, 97 in 2020, and 179 in the first 6 months of 2021 (for an average of 98 units per year), it is not clear if a production level of 200 ADUs per year will be achievable over the planning period. As a result, the element should be updated to include a realistic estimate of potential ADU production.</p>	<p>Page 5: “Burbank issued permits for 54 ADUs in 2018, 110 ADUs in 2019, and 112 ADUs in 2020. Under a correct calculation of HCD’s “Option #1”, Burbank would take the average of the ADU permitting trend between 2018 and 2020, and forecast that 92 ADUs will be permitted per year during the 6th Cycle. This would allow for a total 6th cycle forecast of 736 ADUs.</p> <p>However, Planning counts 1,600 ADUs, or 200 ADUs per year, towards the City’s RHNA target. Planning contends that a small reduction in processing fees, expedited application review, and pre-approved ADU plans will lead to a doubling in the number of ADUs permitted annually going forward. But Planning provides no tangible evidence that these relatively minor incentives will yield this outcome.”</p>	<p>Use HCD’s Option 1 safe harbor, and project that 736 ADUs will be permitted during the 6th Cycle.</p> <p>Follow HCD’s recommendation to track ADU and JADU creation and affordability levels, and commit to a review at the planning cycle midpoint to evaluate if production estimates are being achieved.</p>



January 13, 2022

Divya Sen, Analyst
California Department of Housing and Community Development
Housing Policy Division

Subject: Response to 3rd Party Comments on Revised draft Burbank Housing Element - Abundant Housing LA 12/16/21 Comment Letter

Dear Ms. Sen:

To assist in your review of Burbank’s revised Draft Housing Element submitted to HCD on December 3, 2021, we have prepared the following responses to comments raised by Abundant Housing LA in their December 16, 2021 comment letter on the Element.

Comment #1 (pg 2): *Planning’s process for selecting sites and assessing their capacity does not accurately estimate parcels’ likelihood of development or net new units if redeveloped. Therefore, Planning has not identified enough sites where 8,750 homes will realistically be developed by 2029.*

The opportunity sites in the draft housing element were selected based on site-specific factors that are supportive of redevelopment with housing during the 8-year planning period. The sites are also opportunity sites within the two major specific plan update projects (Golden State Specific Plan and the Downtown Burbank Transit Oriented Development TOD Specific Plan) currently underway in the City. Both specific plans are anticipated for consideration by the City Council within calendar year 2022. The approach taken to use opportunity sites from the specific plans as opportunity sites for the Housing Element is intended to establish consistency throughout the City’s long range planning documents. The timing of the Housing Element coinciding with the specific plan projects provides a unique opportunity to do so. Additionally, the sites themselves are optimal for facilitating new housing development given their size, status of the existing uses, proximity to two of the City’s major employment and transit centers (consistent with city, regional and state efforts to reduce greenhouse gas emissions), and direct and ongoing communication from various developers and/or property owners indicating interest and intent to pursue housing.

The strategies being developed as part of the specific plans will be significant in increasing the likelihood of development on the housing element sites –and within the specific plan areas generally – by establishing objective development standards and streamlining project review. The Golden State Specific Plan also involves significant upzoning of residential density including on the opportunity sites. Additionally, the City recently received funds through SCAG’s Sustainable

ADMINISTRATION 818.238.5176	BUILDING 818.238.5220	HOUSING, ECONOMIC DEVELOPMENT & SUCCESSOR AGENCY 818.238.5180	PLANNING 818.238.5250	SECTION B & CDBG 818.238.5160	TRANSPORTATION 818.238.5270
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Communities Program in addition to funds previously awarded through LEAP to update the existing Media District Specific Plan. This update is anticipated to occur in 2023 and would result in similar code and process improvements as those that will be established with the Golden State and Downtown TOD Specific Plans, and is noted in draft Housing Element Program #5.

In response to Abundant Housing's prior comments, City staff has added descriptions of the suitability of each opportunity site by summarizing our knowledge of site-specific factors that support housing development beyond having the zoning/General Plan in place to do so. Additionally, Housing Element Program #5 was revised to include a mid-cycle review with respect to development of housing on the opportunity sites. The mid-cycle review will be an opportunity to assess the City's progress and, if necessary, make changes accordingly.

Comment #2 (pg 2): *Planning assumes that 2,180 housing units that were approved or pending approval during the 5th Cycle will be built during the 6th Cycle, without accounting for the near-certainty that some projects will never be built.*

The inclusion of housing units that are part of projects already-approved or pending approval is consistent with HCD sites inventory guidelines. Additionally, based on what the City has experienced with recent projects and the continued demand for housing we believe it's reasonable to assume the approved and pending projects will be built. Within the last 6 years only one developer ultimately opted not to move forward with their entitlement. Of the four entitled projects identified in the draft Housing Element, one is under construction, one has been issued building permits, and two are in plan check review.

We recognize that housing production in the 5th cycle was low. Since then, the City Council adopted the Affordable Housing Strategy and the goal of facilitating the building of 12,000 new homes through 2035. City Council action in this regard has sent a positive message to the development community that the City is seeking to facilitate housing that helps to build neighborhoods and seeks to make positive inroads in our 3 to 1 jobs to housing imbalance. The 2,180 housing units in the pipeline reflects that policy and goal-setting at work. The housing element and specific plans will help to further advance these goals. Furthermore, consistent with the City Council housing goal and the programs proposed in the Housing Element, the City Council affirmed its commitment to implementing these housing goals and programs by approving a mixed-use project of 862 rental dwelling units (including 69 deed-restricted units affordable to low-income households) at the former Fry's Electronic Store at 2311 N. Hollywood Way. The project was approved on November 18, 2021, and is the largest mixed use residential unit approved by the City in the last 20 years. The developer of this project is the same one that is currently constructing a 573-unit mixed use project approved by the City Council for the site located at 777 N. Front Street (a noted pipeline project).

Comment #3 (pg 2): *Planning makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies, without providing evidence to support this claim.*

City staff continue to receive ADU applications, averaging about 5 – 10 submittals each week, and with the total number increasing each year since ADU regulations were updated by the State. During the most recent three-year period (Jan 1, 2019 – Dec 31, 2021), the City has issued building

permits for 542 ADUs, an average of 180 ADU permits per year, with 322 ADU permit issued in 2021 alone. From the demand the City has been experiencing over the past three years, the City only sees ADU applications and permitting increasing. It is staff's assessment that our proposed numbers will be met as the City proposes new program initiatives as part of the Housing Update for the 6th Cycle that will bolster ADU production (including reduced fees, reduced processing times for smaller ADUs, and creation of pre-approved ADU plans). Therefore, City staff and the consultant believe 200 ADUs per year for a total of 1,600 ADUs during the eight-year planning period is realistic and achievable.

Additionally, in response to Abundant Housing's earlier comments, the Housing Element includes an explicit commitment to provide mid-cycle review of ADU production.

Comment #4 (pg 2): *Planning did not propose adequate reforms to address the major constraints on redevelopment that exist in Burbank.*

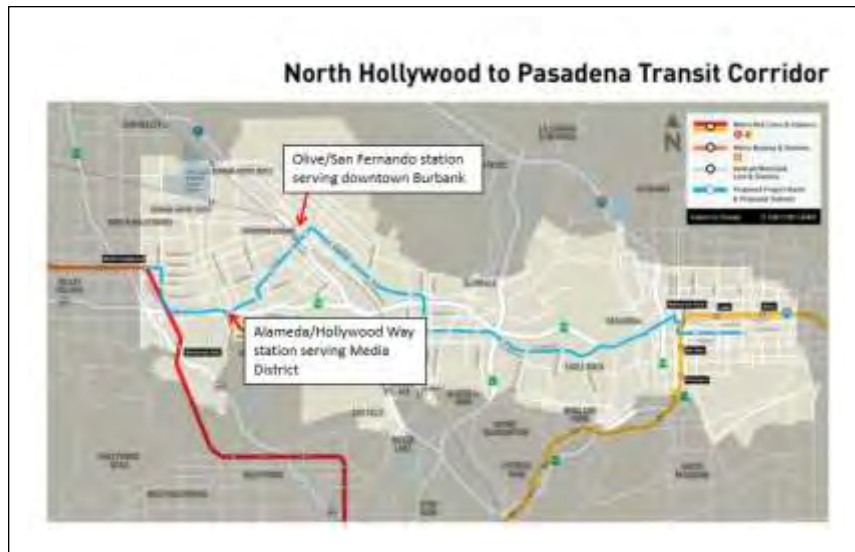
Many of the strategies recommended by Abundant Housing are included in the draft Housing Element as part of the proposed programs. Objective development standards and by-right review processes would be established through the two Specific Plans for qualifying projects including removal of the CUP requirement. Fine-tuning of the details for how this would work are being addressed through the development of the Specific Plans, with the potential to be replicated in other areas of the City including as part of the eventual update to the Media District Specific Plan. Another separate program addresses updating the multifamily development standards, including parking, setbacks, height, and other standards to better enable compact, well-designed multi-family product types.

The proposed Housing Element update also includes a program to create pre-approved ADU plans, and to pursue zoning updates that facilitate infill development in the form of small lot subdivision and missing middle housing. In regards to pre-approved ADU plans, the City has been in discussion with firms such as YIMYADU, Inc. to discuss the possibility of one or more product types that could be pre-approved by the City to streamline review and shorter processing times for this housing type.

Comment #5 (pg 2): *The housing element does not promote new housing opportunities on parcels where apartments are currently banned, even near the planned NoHo-Pasadena busway. Instead, it concentrates lower-income housing opportunities in areas with significant noise and air pollution exposure. This approach fails to affirmatively further fair housing and reverse existing patterns of residential segregation.*

LA Metro's North Hollywood (NoHo) to Pasadena Bus Rapid Transit Corridor, scheduled to begin service in 2024, will extend 18 miles between the San Fernando and San Gabriel Valleys, providing east-west transit service to link key activity centers to improve access to jobs, education and essential services. The NoHo-Pasadena busway will have six stops within the City of Burbank, exiting SR-134 to serve the Burbank Media District and continuing along Olive Avenue to Glenoaks Boulevard. As depicted on the map which follows, two of these stops are in areas where the City is focusing future high density residential development: the station at Olive Avenue and N. San Fernando Boulevard is in the heart of Burbank's downtown where the Downtown TOD Specific Plan is planning for over 3,400 units, and the station at Alameda Avenue and Hollywood

Way falls within the Media District Specific Plan which the City has received funding to update through SCAG's Sustainable Communities Program to accommodate an estimated 2,000 new housing units.



In terms of the relationship of the 19 opportunity sites identified in the Housing Element to affirmatively furthering fair housing (AFFH), sites are located predominately in High and Highest Resource census tracts, with just one site and two pending projects located in a Moderate Resource tract, per the Tax Credit Allocation Committee (TCAC) maps (refer to Exhibit B-21 in Appendix B of the draft Housing Element).

The census tract to the immediate east of the Hollywood Burbank Airport within the Golden State district, where several opportunity sites are identified, is identified as a disadvantaged community per the CalEnviro Screen analysis conducted as part of the Environmental Justice component of the GP update, in that this area is exposed to relatively higher degree of exposure to noise and air pollution. Although the AFFH requirement is related to the TCAC maps for areas of opportunity, the Safety Element update being prepared in conjunction with the 6th cycle Housing Element includes Environmental Justice policies aimed at addressing these environmental hazards by investing in infrastructure improvements through the Golden State Specific Plan; incorporating project design features such as fixed windows, open space, increased tree plantings and higher MERV rated air filtration systems; and making use of the City's Complete Our Streets Plan to help evaluate streetscape design for new projects that considers all modes of transportation with the goal of providing safe and accessible travel to all individuals. The aforementioned 862 unit development at the former Fry's Site (2311 N. Hollywood Way) is a real world example of this type of mixed use project approved by the City that includes many of the noted design features including MERV 13 filtration system, fixed windows, open space, tree plantings and a bike and pedestrian friendly paseo that provides a direct path from the lower income neighborhood south of the Metrolink rail line to the existing Metrolink Station on Vanowen Street.

Comment #6 (pg 3): The City has included multiple Opportunity Sites where redevelopment is far from likely. For example:

TOD 3 (potential for 23 homes) is a collection of lots, including a large parcel owned by Caltrans, two restaurants, and a gas station. While City staff “has been engaged with Caltrans and the adjacent property owners about the viability of redeveloping these parcels as a cohesive mixed-use project”, the housing element does not say when these discussions took place, or whether the owners of these properties are interested in selling their parcels to a single owner. Development projects that involve combining multiple parcels with different owners are often challenging, especially when the owner of the largest parcel is a state agency. While this project is certainly possible, it is far from a certainty.

This opportunity site includes a 1960s IHOP restaurant, fast food eatery and gas station and adjacent 1.58-acre portion of land currently owned by Caltrans. Excluding the Caltrans parcel, the site has an improvement-to-land value ratio of just 0.17, indicating a strong potential for redevelopment with a higher value economic use. City staff has been engaged with Caltrans and the adjacent property owners about the viability of redeveloping these parcels as a cohesive mixed-use project including the introduction of affordable and market rate residential units in proximity to downtown. Redevelopment of the site is being evaluated as part of the Downtown Burbank TOD Specific Plan. This site falls within the Housing Element program to allow for a by-right ministerial review process for projects within the specific plans that include 100 dwelling units or fewer. The existing zoning of the Project site will be updated as a part of the Downtown Burbank TOD Specific Plan to include objective development standards making the project site more conducive for redevelopment. City Planning and Housing staff have initiated communication regarding relinquishment of this and other Caltrans property adjacent to street right of way in the City to facilitate land consolidation to build the projected 23 dwelling units at the proposed site. Furthermore, City’s Planning and Economic Development team have continued outreach with property owners of the San Fernando Blvd. fronting properties to facilitate redevelopment including new housing opportunities at this TOD 3 site consistent with the Housing Element and subject to the development standards being developed as part of the upcoming Downtown Burbank Transit Oriented Development (TOD) Specific Plan.

TOD 7 (potential for 379 homes) is the Civic Center’s parking lots, owned by the City of Burbank. The City has not made a clear commitment to allowing the redevelopment of these sites, and redevelopment of publicly-owned land, while certainly possible, should not be treated as a sure thing.

The Civic Center site currently has no allowable residential density under the Institutional General Plan land use designation. As part of the Downtown TOD Specific Plan and Housing Element implementation, the site’s density will be increased to allow up to 87 dwelling units per acre. This effort will help facilitate the planning and visioning process that the City is currently undertaking with the community and City decision makers to consider redevelopment of City-owned properties within this opportunity site to include a new library, affordable and workforce housing, new office space, shared parking facilities, a transit plaza, and new public open spaces. The existing City Hall building will remain. As part of the development of the Downtown Burbank TOD Specific Plan, the City is developing a general concept for the Civic Center opportunity site that will consider the development of a Public-Private-Partnership (“P3”) to help

facilitate the development of the project during the 2021-2029 planning period. The proposed land uses, including residential, will be evaluated as part of the Specific Plan's Program EIR with the intent to facilitate streamlined review of future development. The Specific Plan will also consider the potential use of transfer development rights, to allow transfer of unused density to other parcels within the Civic Center site. As of January 2022, the consultant team of economists and land use planners have been selected to assist the City in analyzing the site's potential for redeveloping a mix of uses including 379 housing units.

***TOD 8 (potential for 88 homes)** is fully occupied by a variety of small businesses. While the City states that "staff had previous discussions with the property owner about the redevelopment of this opportunity site as a residential/mixed use project", the City doesn't say when these discussions took place, or whether the owner is interested in redevelopment.*

City staff had previous discussions with the property owner about the redevelopment of this opportunity site as a residential/mixed use project. The site currently contains multi-tenant office buildings in the City's Downtown. Most of the buildings on the site were constructed prior to 1980. The site itself is near the City's downtown adjacent to a Los Angeles County Courthouse and across the street from the City's Civic Center. The site is approximately half a mile from the Downtown Burbank Metrolink Train Station, within a High-Quality Transit Area. Per the TCAC Opportunity Map, the site is within a high resource area. The redevelopment effort is focused on facilitating a mixed-use project that combines the potential for new office space with new housing in a major employment and transportation hub. In addition, this site falls within the Housing Element program to allow for by-right ministerial review process for projects within the specific plans that include 100 dwelling units or fewer. The existing zoning of the Project site will be updated as a part of the Downtown Burbank TOD Specific Plan to include objective development standards making the project site more conducive for redevelopment. The City's Planning and Economic Development team have continued outreach with property owners and prospective developers of the subject site to facilitate redevelopment including new housing opportunities consistent with the Housing Element and subject to the development standards being developed as part of the upcoming Downtown Burbank Transit Oriented Development (TOD) Specific Plan.

***Comment #7 (pg 4):** The housing element fails to include policies that would encourage denser development on R-1 parcels.*

The City's primary focus to accommodating future housing growth is to concentrate densities near employment and high quality transit, while preserving and enhancing existing neighborhoods. This is exemplified by the Golden State and Downtown TOD Specific Plans that will provide for over 6,000 additional high density housing units, as well as Media District which is projected to accommodate 2,000 new units. Within Burbank's single-family districts, more limited infill opportunities will be provided through the following:

Senate Bill 9, effective January 1, 2022, allows property owners to split a single-family zoned lot into two lots and/or place up to two housing units on a single-family zoned lot. The City is currently working on a Code update to implement the provisions of SB 9, expanding opportunities for residential infill in high resource single-family zones.

The City is also in the process of updating development standards for R-1 and R-1-H single family residential zones to facilitate development of single-family residential units by incorporating objective standards and eliminating the existing discretionary review process for development of single-family homes. The proposed update to single-family standards, in conjunction with existing regulations that facilitate the provision of ADUs and JADUs, will facilitate development on R-1 parcels.

Additionally, compliant with State law, the City updated its Code to permit transitional and supportive housing in R-1 and R-1-H single-family zones, expanding the variety of by-right housing options in single-family zones.

Appendix A (pgs 6-12) Policy Recommendations:

Identify new funding sources and public resources to encourage the production and preservation of affordable housing.

As stated in Program 14, the City will be evaluating establishing an impact fee on non-residential development to provide an additional source of revenue for the Housing Trust Fund, similar to the City of Glendale. The City's Housing and Grants Division, along with the Burbank Housing Corporation, actively pursues funding sources in support of affordable housing, and as indicated in the AFFH, has secured Permanent Local Housing Allocation funds, and will be pursuing round 2 Project Homekey funds from the State.

Exempt parcels containing rent-restricted and de facto affordable housing from rezoning to prevent displacement of vulnerable households.

In contrast to Burbank's 5th cycle Housing Element which focused new housing growth on underutilized residential parcels, the 19 Housing Opportunity Sites in the 6th cycle Housing Element are located entirely in non-residential districts, thereby minimizing any potential residential displacement. In addition, the City adheres to AB 1397, which requires development on Housing Element sites occupied by lower income households within the last five years to be replaced with affordable units.

Ensure that "no net loss" provisions apply to parcels in the site inventory and rezoning program with an annual and ongoing monitoring and implementation program.

To ensure the City's monitors its compliance with SB 166 (No Net Loss), Program 7 has been added to the Housing Element to develop a procedure to monitor the development of sites in the Housing Element and remaining capacity to address the RHNA by income category.

Prioritize the production of affordable housing on City-owned land, and offer that land to nonprofit developers at no cost as a lawful and bona fide concession under state density bonus law.

Approximately six acres within the Civic Center have been identified as an opportunity site in the Housing Element sites inventory. The City is currently undertaking a visioning process to evaluate redevelopment of City-owned properties within the Civic Center to include the integration of an

estimated 379 units of affordable and workforce housing. The TOD Specific Plan is incorporating concept planning for the Civic Center opportunity site to include a Public-Private Partnership (P3) to help facilitate development of the projects during the 2021-2029 planning period.

Commit to mid-cycle review to verify Planning’s assumptions about development probabilities. If it turns out that sites were developed at a lower-than-expected rate, rezone for additional capacity or make other appropriate adjustments.

Program 5 commits the City to conduct a mid-cycle review (2025) to evaluate production levels in comparison to the RHNA, and if falling significantly short, to rezone additional sites to increase capacity.

Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the RHNA accordingly. If the City doesn’t have this data, it should apply the same discount as the City of Los Angeles due to the close proximity and microeconomic conditions that exist there.

The following table presents an update of the status of projects with development entitlements. As shown, all projects are moving forward. In addition, the former Fry’s Electronics site which was identified as a pending project in the Draft Housing Element received its planning entitlements in November 2021. Within the last six years only one developer ultimately opted not to move forward with their entitlement.

Projects with Entitlements	Description	Zoning	Acres	# Units	Affordability	Project Status (as of Jan 2022)
La Terra 777 Front St	Mixed Use (573 apt. units, 307-room hotel, 1,067 sf retail)	Rezoned from AD (Auto Dealership) to PD 17-01	7 acres	573	Mod: 69 AMod: 504	Project currently undergoing plan check process to obtain building permits
First Street Village 315 N. First St	Mixed Use (275 apt units, 21,265 sf retail/ restaurant)	Rezoned from BCC-2 to PD 14-01	2.99 acres	275	Mod: 14 AMod: 261	Phase 1 of the project is under construction. Applicant undergoing plan check process to obtain building permits for Phase 2.
601-615 E. Cedar Ave.	MF residential	R-4, High Density Residential	0.8 acres	46	Very Low: 3 Low: 5 AMod: 24	Building Permits for the project were issued 4th Quarter of 2021
624-628 San Fernando Blvd	Mixed use (42 apt units and 14,800 sf commercial use)	BCC-3	0.71 acres	42	Very Low: 4 Low: 1 AMod: 37	Project currently undergoing plan check process to obtain building permits
Former Fry’s Electronics Site 2311 N. Hollywood Way	Mixed Use (862 units, 151,800 sf office, 9,700 sf commercial uses)	C-3	10.43 acres	862	Very Low: 80 AMod: 782	Received Planning entitlements November 2021. Applicant will initiate the plan check process soon.

The eight pending projects totaling 626 units identified in the Housing Element are all in various stages of entitlement (excluding the former Fry’s site since it is now entitled). Even if one or two

of these projects ultimately don't end up moving forward, the City has two recent SB 35 applications (see Table below) for a total of 471 units that would more than offset any losses. In summary, the market demand for residential development in Burbank is extremely robust, and the inclusion of entitled and pending projects in the sites inventory is warranted based on the City's experience with recent projects.

Recent Project Applications	Description	Zoning	Acres	# Units	Afford-ability	Project Status (as of Jan 2022)
3000 Empire Ave.	340-unit residential building	M-2 (General Industrial)	1.97 acres	340 units	Low: 271 Mod: 68 AMod:1	SB-35 application (notice of intent filed), SB 330 preliminary application.
3001 Empire Ave.	131-unit residential building	M-2 (General Industrial)	0.68 acres	131	Low: 104 Mod: 26 AMod: 1	SB-35 application (notice of intent filed), SB 330 preliminary application.

Should you have any questions regarding our responses to these comments, please contact me at framirez@burbankca.gov or 818-238-5250.

Regards,

Federico "Fred" Ramirez
Assistant Community Development Director, Planning Division

cc:

Paul McDougall, Housing Policy Development Manager, HCD
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Leonora Camner, Executive Director – Abundant Housing LA



May 13, 2022

Gustavo Velasquez, Director
California Department of Housing & Community Development
2020 West El Camino Avenue, Suite 500
Sacramento, CA 95833

Dear Director Velasquez:

Thank you for the opportunity to comment on the process of updating the Housing Element of Burbank's general plan. We are writing on behalf of **Abundant Housing LA (AHLA)** and **YIMBY Law** regarding Burbank's 6th Cycle Housing Element Update (HEU). **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law.

We support reforms to legalize more homes, make homes easier to build, increase funding for affordable housing, and protect tenants, which are all needed to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

On [5/24/2021](#), [9/29/2021](#) and [12/16/2021](#), AHLA shared letters with Burbank and HCD, regarding drafts of the HEU, providing comments on how Burbank should fulfill both the letter and the spirit of housing element law.

On 2/1/2022, HCD sent a [letter](#) to Burbank regarding an earlier draft of the housing element, identifying corrections that need to be made to obtain certification of the plan. A subsequent draft Housing Element was received by HCD for review on 4/4/2022. The purpose of this letter is to provide our comments on the subsequent draft HEU.

We have reviewed the City's subsequent draft HEU received by HCD on 4/4/2022, **and continue to have major concerns about Burbank's ability to meet its state-mandated RHNA targets.**

On 12/16/2021, MapCraft Labs published [an analysis](#)¹ of an earlier draft of the HEU, which was commissioned by AHLA. The purpose of the analysis was to evaluate Burbank's sites inventory to assess its likely impact on housing production. The analysis found a capacity shortfall of between approximately 1,100 and 2,300 units and made several recommendations for improving the Housing Element, which are summarized below.

The 2/1/2021 HCD review letter identified deficiencies in the previous draft HEU. This letter concludes by highlighting common themes in AHLA and HCD's comments.

¹ MapCraft Labs (2021). "Burbank Housing Element Analysis Results" page 1.

Discussion of issues that AHILA raised previously:

Comment 1: “Planning’s process for selecting sites and assessing their capacity does not accurately estimate parcels’ likelihood of development or net new units if redeveloped. Therefore, Planning has not identified enough sites where [8,772] homes will realistically be developed by 2029.”

The HEU relies on just 19 sites to accommodate a large portion of the RHNA. Many of these sites have substantial constraints to housing in the form of existing structures and environmental factors. For example, a major grouping of seven housing opportunity sites is located in the Golden State Specific Plan (GSSP) area, which is in close proximity to the Hollywood Burbank Airport and characterized by existing industrial uses. These factors raise concerns about future residents’ exposure to noise and pollution from existing uses and related questions about how these environmental conditions may deter developers from building housing. One of the sites, “GSSP 3 - Valhalla”, which is supposed to accommodate 678 homes, is located in the airport influence area, and may face additional development constraints, such as on building height, which should be analyzed². On another site, “GSSP 7 - Empire”, Burbank claims capacity for 510 homes, but the aerial image provided shows a substantial portion of the site is covered with existing buildings³. While redevelopment of this site may be technically possible, the plan should include an analysis of likely constraints to that redevelopment, such as existing leases, so that the likelihood of redevelopment during the planning period can be properly accounted for.

Furthermore, the sites inventory is required to specify the projected number of units at each affordability level for each site, per HCD’s standard form⁴, yet this information is missing in the sites inventory⁵. Burbank has an obligation to present substantial evidence that existing uses will discontinue during the planning period because non-vacant sites are accommodating over half of the lower-income RHNA⁶, but it is not clear exactly where the lower-income RHNA would be accommodated. This issue is especially relevant because Burbank saw only 26% of its 5th cycle RHNA actually built, with significant shortfalls of housing affordable to moderate, low and very low income households⁷. The 6th cycle RHNA numbers are significantly higher, meaning more effort will be required to meet them.

In the Downtown TOD Specific Plan area, analysis of existing leases to assess realistic development potential is critical. For example, on site “TOD 6 - Burbank Town Center” Burbank claims capacity for 1,020 homes, and states that the property was purchased by a firm interested in redevelopment⁸. However, the site is developed with a large indoor mall where many existing leases could constrain redevelopment over the next eight years. Perhaps a developer could buy out those leases, but that would increase the cost and affect the feasibility

² Burbank Subsequent Draft Housing Element, page 1-80.

³ Burbank Subsequent Draft Housing Element Appendices, page D-24.

⁴ California Government Code Section 65583.3.

⁵ Burbank Subsequent Draft Housing Element Appendices, pages D-8 - D-13.

⁶ California Government Code Section 65583.2.(g)(3)

⁷ Burbank Subsequent Draft Housing Element Appendices, page C-13.

⁸ Burbank Subsequent Draft Housing Element Appendices, page D-19.

of any potential redevelopment, and particularly of any below market rate units that may be included in such a development, as Burbank's inclusionary zoning ordinance would require. This is the site with the largest claimed capacity for new housing in the plan (about 12% of the RHNA), and the assumptions around realistic development capacity here must be better supported.

Comment 2: "Planning assumes that 2,180 housing units that were approved or pending approval during the 5th Cycle will be built during the 6th Cycle, without accounting for the near-certainty that some projects will never be built."

The sites inventory now claims 2,431 units from entitled or "pending" projects⁹. However, it is not legitimate to assume that 100% of proposed, entitled, or even permitted units will actually be built. In all of these scenarios there is some probability that the project will not be completed. Burbank can and should report and assess what these probabilities are with reference to its own historical experience with past projects and discount the number of units claimed as in pipeline appropriately. Furthermore, the number of units claimed must be specified at each affordability level.

Comment 3: "Planning makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies, without providing evidence to support this claim."

The plan states that 181 ADUs were permitted annually between 2019 and 2021 and then projects 200 ADUs per year over the planning period. HCD lays out a safe harbor option for projecting ADUs based on permitting trends since 2018¹⁰. While it is conceivable that programs to promote ADUs could result in production during the planning period exceeding the historical average, we recommend adhering to the historical average since 2018 for purposes of projections to account for factors that could depress ADU production during the planning period, such as a recession. A conservative ADU forecast also creates an additional buffer in case the plan's expectations on other sites are not met, as seems probable (see discussion above under Comment 1).

Comment 4: "Planning did not propose adequate reforms to address the major constraints on redevelopment that exist in Burbank."

Program 10¹¹ includes evaluating Burbank's Inclusionary Zoning Ordinance and should include specific reform commitments to make it less burdensome and more effective at producing housing at all income levels. For rental housing developments the ordinance currently requires 10% of homes to be affordable for lower-income households and 5% to be affordable for very low income households. This framing is not well aligned with the state density bonus law

⁹ Burbank Subsequent Draft Housing Element Appendices, page D-7.

¹⁰ HCD Site Inventory Guidebook, page 31.

¹¹ Burbank Subsequent Draft Housing Element, page 1-107.

because that law requires the granting of one density bonus for qualifying projects¹². Burbank's requirements for low income and very low income units each would individually trigger a state density bonus, but those bonuses do not "stack" as a matter of state law. It would be better to specify a menu of options at different affordability levels, at the lower end of what triggers a state density bonus. For example requiring 10% of units for low-income households or 5% for very low income households, instead of requiring both. In this manner a homebuilder would qualify for a state density bonus to offset the feasibility challenges that can come with requiring affordable units. Of course, a builder could always choose to exceed the minimum affordability requirements, if incentives are properly structured so that pathway is feasible.

Program 5 discusses revisions to parking requirements consistent with state density bonus law. Parking requirements increase the cost of housing, reduce the density of development, and exacerbate environmental problems, and we advocate for their abolition at the state and local level. State density bonus law lays out three different scenarios whereby parking requirements may be reduced, and different reductions, based on the level of affordability and other factors¹³. Since Burbank has an inclusionary zoning ordinance that triggers state density bonuses, projects will qualify for this parking relief regardless of what Burbank does to change parking requirements in its municipal code. A more meaningful action would be to propose eliminating residential parking requirements or at least reducing them to levels below what state density bonus law makes available.

The plan makes the problematic decision to steer development away from areas zoned single-family residential, instead directing it to the Downtown TOD Specific Plan Area and Golden State Specific Plan Area. Single-family zoning is a significant constraint to housing production, and particularly the production of affordable housing. While the plan does include some positive programs around ADUs, such as pre-approved plans and reduced fees, the plan should go farther to promote housing opportunities in exclusionary areas. Cities are required to permit ADUs and SB 9 duplexes and lot splits by state law. Burbank should go beyond strategies that are driven by state law and legalize bungalow courts, townhomes, and small apartment buildings in all residential neighborhoods, with reasonable public safety exceptions such as for high fire hazard severity zones.

The lack of funding for affordable housing as a constraint merits further consideration. For example, Program 1a discusses using \$5 million in redevelopment successor agency funding to purchase ten market rate units and preserve them as affordable¹⁴. The analysis of the inclusionary zoning ordinance does not make clear how much money it has raised in in-lieu fees or how many affordable units have been built under its provisions, if any. Given the scarcity of available funding, it is critical that Burbank commit to raising more funding locally and aligning its affordable housing incentives and mandates well with the state density bonus law, as discussed above.

¹² California Government Code Section 65915.(b)(1)

¹³ California Government Code Section 65915.(p)

¹⁴ Burbank Subsequent Draft Housing Element, page 1-101.

Per HCD's review letter, the HEU in Program 7¹⁵ commits to rezoning certain sites identified but not redeveloped in prior planning periods for 20% affordable projects to be approved by right. However, we recommend extending by right approval to all 20% affordable projects, or even more broadly (where not already covered by other ministerial approval programs), because this standard would be easier to track and administer and is more supportive of housing construction than the minimum standard in state law.

Comment 5: "The housing element does not promote new housing opportunities on parcels where apartments are currently banned, even near the planned NoHo-Pasadena busway. Instead, it concentrates lower-income housing opportunities in areas with significant noise and air pollution exposure. This approach fails to affirmatively further fair housing and reverse existing patterns of residential segregation."

With regard to affirmatively furthering fair housing (AFFH), Exhibit B-25¹⁶, which shows the sites inventory overlaid on a map of low to moderate income population, is concerning. The map shows that the vast majority of opportunity sites are located in areas with the highest concentrations of low to moderate income households. This means that the HEU is unlikely to reverse patterns of socioeconomic segregation in Burbank, which is essential to AFFH. Furthermore, Exhibit B-27¹⁷, shows a significant proportion of opportunity sites are located in areas that are designated as susceptible to displacement or areas of ongoing displacement. To some extent this approach is justified, since this is the area where Downtown Burbank is located, and a place where future residents would have good access to jobs and transit. However, it is critical to strengthen programs to protect residential tenants. Program 3¹⁸, on this subject, mainly references compliance with existing state laws, but Burbank should go further, for example by establishing a robust right to compensation in a no-fault eviction for redevelopment and a right to return at the previous rent for some period of time. Policies such as these would help steer investment to areas where fewer tenants would be displaced. However, this must be accompanied by strong policies to create more housing opportunities in other parts of the city, particularly in areas zoned single-family residential.

As discussed above in Program 1, a significant portion of the sites inventory is located in the Golden State Specific Plan area, where existing industrial uses and the airport not only constrain redevelopment, but also raise environmental justice concerns for future residents of the area.

The planned [North Hollywood to Pasadena Bus Rapid Transit Project](#) would run through southern Burbank along Olive Avenue and Glenoaks Boulevard, with a connection to the Downtown Burbank Metrolink station. Although the plan references some future rezoning of the Media District in Program 5¹⁹, the commitment is somewhat vague and this area is not part of

¹⁵ Burbank Subsequent Draft Housing Element, page 115.

¹⁶ Burbank Subsequent Draft Housing Element, page B-57

¹⁷ Burbank Subsequent Draft Housing Element, page B-60

¹⁸ Burbank Subsequent Draft Housing Element, page 1-102.

¹⁹ Burbank Subsequent Draft Housing Element, page 1-103.

the sites inventory. The HEU should take full advantage of the opportunity to plan for more homes at all income levels near high-quality transit, which allows people to lower their transportation costs and live more sustainably.

Rezoning Deadline

California Government Code Section 65583.(c)(1)(A) states in part “a local government that fails to adopt a housing element that the department has found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning of those sites, including adoption of minimum density and development standards, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.” The statutory deadline for jurisdictions in the SCAG region, such as Burbank, was 10/15/2021. Per HCD’s website, the subsequent draft HEU was received for review on 4/4/2022, after the 120 day grace period had elapsed.

Some of the programs (e.g. Programs 12, 14, 18) to rezone and adopt supportive development standards, target implementation dates after the one-year rezoning deadline of 10/15/2022. However, this schedule is not available to jurisdictions that fail to obtain certification of their housing elements in a timely manner, as described above. Therefore, HCD should clarify that compliance with the one-year rezoning deadline is required.

MapCraft Analysis:

The [MapCraft analysis](#) of the HEU commissioned by AHLA found that the capacity claimed in the sites inventory could fall short by approximately 1,100 to 2,300 units. The finding lends support to our conclusion that the sites inventory is not adequately considering realistic development capacity of non-vacant sites. The analysis considered historic development scale and financial feasibility analysis under different parking requirements scenarios. The analysis makes the following recommendations:

1. “Right-sizing claimed capacity on sites in the current site inventory, both by reducing expectations on many sites and being more ambitious in upzoning other sites. The city could revisit additional opportunities to rezone more parcels in the inventory, particularly in areas like Downtown and along commercial corridors like West Olive Avenue.”
2. “Adding more sites to the site inventory and evaluating rezoning of those sites. Excluding ADUs, the inventory addresses only 3.5% of the city’s 4,200 parcels, so there are many places that could be explored further to address this potential shortfall.”
3. “Reducing or eliminating parking requirements and promoting automobile alternatives to reduce households’ demand for parking. If developers could meet household demand with fewer on-site parking stalls, it could make multifamily development in many parts of the City more economically feasible.”
4. “Introducing new economic incentives to increase the financial feasibility of redevelopment, especially for projects that include below-market-rate units.”

5. "Consider establishing development minimums to ensure high utilization of sites with feasible housing capacity."

Comparison of HCD Comment Letter and AHLA/YIMBY Law Comment Letter:

The table below lists the comment numbers that are relevant to the categories of deficiencies identified, along with a summary of key AHLA and YIMBY Law policy recommendations for each category.

Deficiency	AHLA/YIMBY Law Comment Letter	HCD Comment Letter	Key AHLA/YIMBY Law Policy Recommendations
Sites Inventory	1, 2, 3	A2	<p>Improve analysis of constraints to housing production such as environmental factors in the GSSP area, and existing leases.</p> <p>Inventory must project units at each affordability level for each site.</p> <p>Adjust the number of units expected from in-pipeline projects to reflect the reality that not all projects will be built, based on historical trends in Burbank.</p> <p>Use the HCD ADU forecast safe harbor based on permitting trends since 2018.</p>
Funding and Promoting Affordable Housing and Housing for Special-Needs Groups	4	B2	<p>Commit to raising local funds to fund affordable housing and better align inclusionary zoning ordinance with state density bonus law.</p>
Governmental Constraint Removal	4	A3, B1, B3	<p>Better align the inclusionary zoning ordinance with state density bonus law.</p> <p>Eliminate parking requirements or at least reduce them beyond what state density bonus law already accomplishes.</p> <p>Upzone single-family areas to allow</p>

			a balanced mixture of housing types going beyond state ADU law and SB 9.
AFFH Analysis and Programs to Promote Integrated Neighborhoods	5	A1, B4	<p>Upzone single-family areas to allow a balanced mixture of housing types going beyond state ADU law and SB 9.</p> <p>Strengthen anti-displacement policies, including a robust right to compensation for a no-fault eviction and right to return at previous rent for some period of time.</p> <p>GSSP sites are problematic due to existing industrial uses and the airport raising environmental justice concerns.</p> <p>Take advantage of the opportunity to allow more housing at all income levels near planned BRT stations.</p>
Public Participation	We concur with HCD's comment	C	Improve outreach methods to lower income and special-needs households.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss

Sonja Trauss
Executive Director
YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD
Divya Sen, HCD
Burbank Planning Department



**COMMUNITY
DEVELOPMENT**

August 10, 2022

Leonora Camner, Executive Director
Abundant Housing LA

Sonja Trauss, Executive Director
YIMBY Law

**Subject: Response to May 13th, 2022 Comment Letter on Revised draft Burbank
2021-2029 Housing Element**

The following memo summarizes comments Abundant Housing LA and Yimby Law provided to the State Department of Housing and Community Development (HCD) on Burbank’s draft Housing Element in a letter dated May 13, 2022, and provides City staff’s response to each comment raised. In a telephone conversation on July 6, 2022, HCD confirmed that Burbank’s draft Housing Element fully complies with state Housing Element statutes.

Comment #1 (pg 2): *Planning’s process for selecting sites and assessing their capacity does not accurately estimate parcels’ likelihood of development or net new units if redeveloped. Therefore, Planning has not identified enough sites where [8,772] homes will realistically be developed by 2029.*

The opportunity sites in the draft housing element were selected based on site-specific factors that are supportive of redevelopment with housing during the 8-year planning period. The sites are also opportunity sites within the two major specific plan update projects (Golden State Specific Plan and the Downtown Burbank Transit Oriented Development TOD Specific Plan) currently underway in the City. Both specific plans are anticipated for consideration by the City Council within fiscal year 2022-2023. The approach taken to use opportunity sites from the specific plans as opportunity sites for the Housing Element is intended to establish consistency throughout the City’s long range planning documents. The timing of the Housing Element coinciding with the specific plan projects provides a unique opportunity to do so. Additionally, the sites themselves are optimal for facilitating new housing development given their size, status of the existing uses, proximity to two of the City’s major employment and transit centers (consistent with city, regional and state efforts to reduce greenhouse gas emissions), and direct and ongoing communication from various developers and/or property owners indicating interest and intent to pursue housing.

The strategies being developed as part of the specific plans will be significant in increasing the likelihood of development on the housing element sites –and within the specific plan areas generally – by establishing objective development standards and streamlining project review. The Golden State Specific Plan also involves significant upzoning of residential density including on the opportunity sites. Additionally, the City received funds through SCAG’s Sustainable

ADMINISTRATION	✦	BUILDING	✦	HOUSING, ECONOMIC DEVELOPMENT & SUCCESSOR AGENCY	✦	PLANNING	✦	SECTION 8 & CDBG	✦	TRANSPORTATION
818.238.5176		818.238.5220		818.238.5180		818.238.5250		818.238.5160		818.238.5270

Communities Program in addition to funds awarded through LEAP to update the existing Media District Specific Plan. This update is anticipated to occur in 2023 and would result in similar code and process improvements as those that will be established with the Golden State and Downtown TOD Specific Plans, and is noted in draft Housing Element Program #5.

In response to Abundant Housing's prior comments, City staff has added descriptions of the suitability of each opportunity site by summarizing our knowledge of site-specific factors that support housing development beyond having the zoning/General Plan in place to do so. Additionally, Housing Element Program #5 was revised to include a mid-cycle review with respect to development of housing on the opportunity sites. The mid-cycle review will be an opportunity to assess the City's progress and, if necessary, make changes accordingly.

Comment #1a (pg 2): *Sites located in the GSSP are close to the Hollywood Burbank Airport and are characterized by existing industrial uses, raising concerns about future residents' exposure to noise and pollution and how these environmental factors may deter developers from building housing.*

Approval of an 862-unit mixed use project on the former Fry's site in the GSSP illustrates how project design features and mitigation measures can allow residential uses to safely be introduced in the area. The Fry's site is adjacent to the Airport Influence Area and railroad right of way. The approved project includes numerous measures to address noise control such as MERV 13 filtration system, sound baffling glass barriers, and interior design of units to maintain interior unit noise to 45 dBA, to name a few. The project is consistent with the City's Burbank2035 General Plan goals and policies that seek to facilitate mixed use and transit-oriented development projects near public transit and employment centers while ensuring that new residential development located near the airport, railroad, and freeways are designed to address any potential health risks in compliance with City green building codes, the City's Greenhouse Gas Reduction Plan (updated May 2022), and Burbank2035 Land Use, Housing, Air Quality/Greenhouse Gas, and Mobility Elements. Any future development in the GSSP will be required to receive similar clearances to the Fry's site from the FAA and the Airport Land Use Committee before obtaining approval from the City for development.

In addition to the Fry's site, the City has received a Notice of Intent to Submit an SB 35 application on three other sites in the GSSP, including 148 units being proposed at 2814 W. Empire Avenue, 340 units proposed for 3000 W. Empire Avenue, and 131 units being proposed at 3001 W. Empire Avenue; a fourth SB 35 application has also been received outside the GSSP for 144 units at 3201 W. Olive Avenue. These projects are indicative of the high level of development interest in the area and provide evidence that the existing conditions are not serving as an impediment to residential development.

Comment #1b (pg 2): *The sites inventory is required to specify the projected number of units at each affordability level for each site.*

The completed HCD Sites Inventory Table has been added to Appendix D of the Housing Element. Please use the following link to access the document: <https://www.burbankhousingelement.com/>

Comment #1c (pg 2-3): *Redevelopment of the Burbank Town Center site (TOD Site 6) may be constrained by existing leases. This site has the largest claimed capacity for new housing in the Housing Element and the assumptions around realistic development capacity need to be better supported.*

As of November 2021, the Onni Group has acquired the Burbank Town Center for redevelopment purposes, and has been in discussions with City staff about the pending Downtown Burbank TOD Specific Plan as it relates the Town Center site. In May of 2022, City staff met with the property owner's representatives and architects about a potential mixed-use project at the subject site. The property owner's representatives conveyed their interest in being involved in the Downtown TOD Specific Plan process to provide input on a mixed-use project of the subject site that is consistent with the Specific Plan project objectives and with the Program Environmental Impact Report to preserve any future opportunities for streamlined project review and environmental assessment. While they are still defining the precise scope of their project, Onni's goal is to develop well in excess of the 1,020 units identified in the Housing Element for this site, as confirmed in a May 2022 letter sent by the Onni's Vice President of Development to the City. Communications between staff and the property owner's representatives is ongoing.

Comment #2 (pg 3): *Planning assumes that 2,431 housing units that were approved or pending approval during the 5th Cycle will be built during the 6th Cycle, without accounting for the near-certainty that some projects will never be built.*

The inclusion of housing units that are part of projects already-approved or pending approval is consistent with HCD sites inventory guidelines. Additionally, based on what the City has experienced with recent projects and the continued demand for housing we believe it's reasonable to assume the approved and pending projects will be built. Within the last 6 years only one developer ultimately opted not to move forward with their entitlement. Of the six entitled projects identified in the draft Housing Element, two are under construction, one has been issued building permits and have demolished existing buildings onsite, one has been issued building permits, and two are in plan check review. In addition, as shown in Table 1-42 in the Housing Element, the City has two additional pending projects on Empire Avenue for which staff has received a Notice of Intent to Submit an SB 35 application for a total of 471 units; these proposed units haven't been included in the sites inventory as formal applications have not yet been submitted.

We recognize that housing production in the 5th cycle was low. Since then, the City Council adopted the Affordable Housing Strategy and the goal of facilitating the building of 12,000 new homes through 2035. City Council action in this regard has sent a positive message to the development community that the City is seeking to facilitate housing that helps to build neighborhoods and seeks to make positive inroads in our 3 to 1 jobs to housing imbalance. The 2,180 housing units in the pipeline reflects that policy and goal-setting at work. The housing element and specific plans will help to further advance these goals. Furthermore, consistent with the City Council housing goal and the programs proposed in the Housing Element, the City Council affirmed its commitment to implementing these housing goals and programs by approving a mixed-use project of 862 rental dwelling units (including 80 deed-restricted units affordable to very low-income households) at the former Fry's Electronic Store at 2311 N. Hollywood Way. The project was approved by the City Council on November 18, 2021, and is the largest mixed use residential unit approved by the City in the last 20 years. The developer of this project is the same

one that is currently constructing a 573-unit mixed use project approved by the City Council for the site located at 777 N. Front Street (a noted pipeline project).

Comment #3 (pg 3): *Planning makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies, without providing evidence to support this claim.*

City staff continue to receive ADU applications, averaging about 5 – 10 submittals each week, and with the total number increasing each year since ADU regulations were updated by the State. During the most recent three-year period (Jan 1, 2019 – Dec 31, 2021), the City has issued building permits for 542 ADUs, an average of 181 ADU permits per year, with 322 ADU permit issued in 2021 alone. Between January 1 – May 13, 2022, the City issued 85 building permits for ADUs; extrapolating this rate over a one-year period equates to 236 permits, demonstrating the continued demand for ADUs in the community. From the demand the City has been experiencing over the past three years, the City only sees ADU applications and permitting increasing. It is staff's assessment that our proposed numbers will be met as the City proposes new program initiatives as part of the Housing Update for the 6th Cycle that will bolster ADU production (including reduced fees, reduced processing times for smaller ADUs, and creation of pre-approved ADU plans). Therefore, City staff and the consultant believe 200 ADUs per year for a total of 1,600 ADUs during the eight-year planning period is realistic and achievable.

Additionally, in response to Abundant Housing's earlier comments, the Housing Element includes an explicit commitment to provide mid-cycle review of ADU production.

Comment #4 (pg 3): *Planning did not propose adequate reforms to address the major constraints on redevelopment that exist in Burbank.*

Many of the strategies recommended by Abundant Housing are included in the draft Housing Element update as part of the proposed programs. Objective development standards and by-right review processes would be established through the two Specific Plans (i.e., Downtown TOD and Golden State specific plans) for qualifying projects including removal of the CUP requirement. Fine-tuning of the details for how this would work are being addressed through the development of the Specific Plans, with the potential to be replicated in other areas of the City including as part of the eventual update to the Media District Specific Plan. Another separate program addresses updating the multifamily development standards, including parking, setbacks, height, and other standards to better enable compact, well-designed multi-family product types.

The proposed Housing Element update also includes a program to create pre-approved ADU plans, and to pursue zoning updates that facilitate infill development in the form of small lot subdivision and missing middle housing. In regards to pre-approved ADU plans, the City has been in discussion with firms such as YIMBYADU, Inc. to discuss the possibility of one or more product types that could be pre-approved by the City to streamline review and shorter processing times for this housing type.

Comment #4a (pg 3): *Housing Element Program 10 to update Burbank's Inclusionary Ordinance should include specific commitments to make it less burdensome and more effective at producing*

affordable housing. The structure of the ordinance is not well aligned with state density bonus law.

As shown in Table 1-42, Burbank has numerous projects in the pipeline that are complying with the City's current inclusionary requirements and providing affordable units within their projects. Most of these projects are also taking advantage of state density bonus law to achieve additional units. The City is in the process of updating its Inclusionary Housing Ordinance and is projected to have the draft update of the local inclusionary housing regulations completed by the end of 2022. As part of this update, changes to the Ordinance will be evaluated, which are complementary to current state density bonus law.

Comment #4b (pg 4): *Housing Element Program 5 discusses revisions to parking requirements consistent with state density bonus law. A more meaningful action would be to propose eliminating residential parking requirements or at least reducing to a level below what state density bonus law makes available.*

Housing Element Program 9 identifies numerous incentives the City will offer in the TOD and GSSP specific plans to promote development on its Housing Element sites. Among these are to reduce parking requirements consistent with standards available under density bonus law, with potential further reductions in exchange for provision of community benefits.

Comment #4c (pg 4): *The housing element fails to include policies that would encourage denser development on R-1 parcels.*

The City's primary focus to accommodating future housing growth is to concentrate densities near major employment centers and high-quality transit, while preserving and enhancing existing neighborhoods. This is exemplified by the Golden State and Downtown TOD specific plans that will provide for over 6,000 additional high density housing units, as well as Media District, which is projected to accommodate up to 2,000 new units. Within Burbank's single-family districts, more limited infill opportunities will be provided through the following:

Senate Bill 9, effective January 1, 2022, allows property owners to split a single-family zoned lot into two lots and/or place up to two housing units on a single-family zoned lot. The City approved an urgency ordinance for SB 9 and is currently working on a Code update to implement the provisions of SB 9, expanding opportunities for residential infill in high resource single-family zones.

The City approved updated development standards in March 2022 for R-1 and R-1-H single family residential zones to facilitate development of single-family residential units by incorporating objective standards and eliminating the existing discretionary review process for development of single-family homes. The proposed update to single-family standards, in conjunction with existing regulations that facilitate the provision of ADUs and JADUs, will facilitate development on R-1 parcels.

Additionally, compliant with State law, the City updated its Code to permit transitional and supportive housing in R-1 and R-1-H single-family zones, expanding the variety of by-right housing options in single-family zones.

Comment #4d (pg 4): *The Housing Element should go farther to promote housing in single-family areas than just permitting ADUs and SB 9 duplexes and lot splits as required under state law, such as allowing bungalow courts, townhomes and small apartment buildings.*

Housing Element Program 12 identifies several actions the City will undertake to promote homeownership opportunities for first-time homebuyers which will also serve to open up single-family neighborhoods to a broader range of housing types. These include:

- Creation of a small lot subdivision ordinance to accommodate single-family infill housing in commercial and multi-family neighborhoods
- Evaluating allowing “duet homes” – duplexes, which are sold and owned separately – within single-family zones
- Support co-housing communities that are individually owned, private units clustered around common facilities
- Incentivizing the construction of missing middle housing of 15-30 units to the acre including smaller apartments, townhome and rowhouse style development

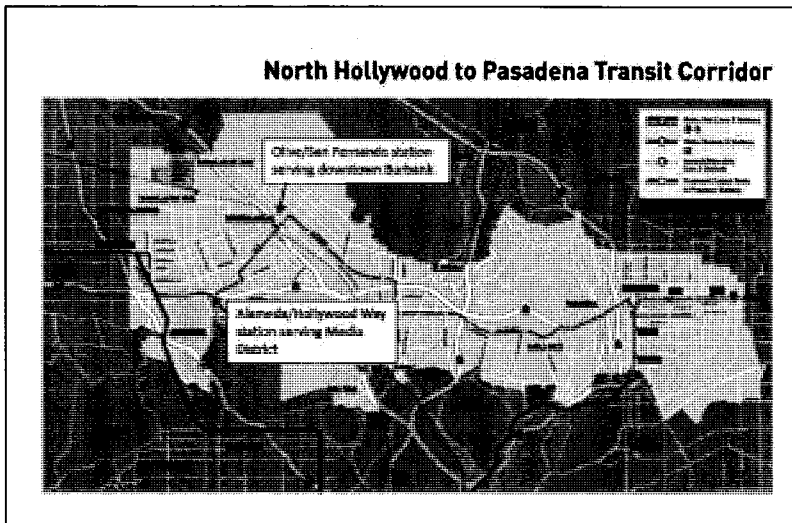
Comment #4e (pg 5): *Two sites included in the Housing Element Site Inventory for lower-income housing were also in the previous (5th cycle) Burbank Housing Element and have projects pending entitlement: The Premier on First and 529-537 E. Palm Avenue. If projects are not approved as indicated, the City will allow for by-right approval of any future projects on these sites that set-aside at least 20 percent of units as affordable to lower income households, as required under state law. We recommend extending by right approval to all 20% affordable projects.*

As presented in Housing Element Program 5, the City is going beyond what is required under state law, allowing by right processing on sites within the TOD and GSSP specific plans for projects proposing 100 or less units.

Comment #5 (pg 5): *The housing element does not promote new housing opportunities on parcels where apartments are currently banned, even near the planned NoHo-Pasadena busway. Instead, it concentrates lower-income housing opportunities in areas with significant noise and air pollution exposure. This approach fails to affirmatively further fair housing and reverse existing patterns of residential segregation.*

LA Metro's North Hollywood (NoHo) to Pasadena Bus Rapid Transit Corridor, scheduled to begin service in 2024, will extend 18 miles between the San Fernando and San Gabriel Valleys, providing east-west transit service to link key activity centers to improve access to jobs, education and essential services. The NoHo-Pasadena busway will have six stops within the City of Burbank, exiting SR-134 to serve the Burbank Media District and continuing along Olive Avenue to Glenoaks Boulevard. As depicted on the map below, two of these stops are in areas where the

City is focusing future high density residential development: the station at Olive Avenue and N. San Fernando Boulevard is in the heart of Burbank's downtown where the Downtown TOD Specific Plan is planning for over 3,400 units, and the station at Alameda Avenue and Hollywood Way falls within the Media District Specific Plan which the City has received funding to update through SCAG's Sustainable Communities Program to accommodate an estimated up to 2,000 new housing units.



In terms of the relationship of the 19 opportunity sites identified in the Housing Element update to affirmatively furthering fair housing (AFFH), sites are located predominately in High and Highest Resource census tracts, with just one site and two pending projects located in a Moderate Resource tract, per the Tax Credit Allocation Committee (TCAC) maps (refer to Exhibit B-21 in Appendix B of the draft Housing Element).

The census tract to the immediate east of the Hollywood Burbank Airport within the Golden State district, where several opportunity sites are identified, is identified as a disadvantaged community per the CalEnviro Screen analysis conducted as part of the Environmental Justice component of the General Plan update, in that this area is exposed to relatively higher degree of exposure to noise and air pollution. Although the AFFH requirement is related to the TCAC maps for areas of opportunity, the Safety Element update being prepared in conjunction with the 6th cycle Housing Element includes Environmental Justice policies aimed at addressing these environmental hazards by investing in infrastructure improvements through the Golden State Specific Plan; incorporating project design features such as fixed windows, open space, increased tree plantings and higher MERV rated air filtration systems; and making use of the City's Complete Our Streets Plan to help evaluate streetscape design for new projects that considers all modes of transportation with the goal of providing safe and accessible travel to all individuals. The aforementioned 862 unit development at the former Fry's Site (2311 N. Hollywood Way) is a real world example of this type of mixed use project approved by the City that includes many of the noted design features including MERV 13 filtration system, fixed windows, open space, tree plantings and a bike and pedestrian friendly paseo that provides a direct path from the lower income neighborhood south of the Metrolink rail line to the existing Metrolink Station on Vanowen Street.

Comment #5a (pg 5): *The majority of Housing Element sites are located in areas with the highest concentrations of low and moderate income households. Thus, the Housing Element is unlikely to reverse patterns of socioeconomic segregation, which is essential to AFFH.*

As depicted in Figure B-25, census tracts with a high percentage (50-75%) of low - moderate income households are concentrated along the I-5 corridor. These generally coincide with the transit and jobs-rich areas that are proposed for future investment and new development of residential and commercial uses with the adoption and implementation of the Burbank Downtown TOD and Golden State specific plans. Development of mixed income housing in these areas will help to integrate a wider range of housing opportunities in census tracts identified as high and highest resource by TCAC (California Tax Credit Allocation Committee).

Comment #5b (pg 5): *A significant proportion of the housing opportunity sites are located in areas designated as susceptible to displacement. It is critical to strengthen programs to protect residential tenants, accompanied by programs to create more housing opportunities in other parts of the city, and in single-family areas in particular.*

Development on Housing Element opportunity sites will not directly cause significant displacement as they are currently developed with predominately non-residential uses. However, new market rate development in areas already at-risk of displacement may place upward pressure on rents, resulting in the potential displacement of existing lower income residents. Locating lower income sites in these areas can help to protect vulnerable residents from being displaced under changing market pressures.

Burbank carries out several anti-displacement programs including limits on rent increases and prohibiting evictions without just cause for tenants that have resided in their units for more than 12 months; providing relocation fees when state or federal funds are utilized; and offering existing households an opportunity to return to the new development. The City implements the requirements of California Government Code Section 65583.2(g)(3), which requires that for any proposed development on a site that has had residential uses within the past five years that are or were subject to lower income affordability restrictions, or are or were occupied by lower income households, the City shall require the replacement of all affordable units at the same or lower income level as a condition of development on the site.

Comment #6 (pg 6): *Some of the programs to rezone and adopt supportive development standards target implementation dates after the one-year rezoning deadline.*

The referenced Housing Element Housing Plan programs 12, 14 and 18 involve Burbank Municipal Code text amendments but do not involve amendments to the Zoning Map. In addition, SB 197 has extended the rezoning deadline to February 2025 for SCAG jurisdictions with a Housing Element found in compliance within one year of the 2021 statutory deadline.

Should you have any questions regarding our responses to these comments, please contact me at framirez@burbankca.gov or 818-238-5250.

Regards,



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