

Final Draft

WEST SAN GABRIEL VALLEY AREA PLAN

Anti-Displacement Background Brief

Prepared for
Los Angeles County Department of Regional Planning

December 2023



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I. Introduction

Purpose of the Brief

This Anti-Displacement Brief is intended to assess displacement risk among residents of the West San Gabriel Valley Area Plan (WSGVAP), as well as identify local market conditions that affect the provision of affordable housing.

The Brief estimates the need for affordable housing in the Area Plan based on the characteristics of the existing population, taking into account the County's Housing Element goals.

The Brief also identifies existing tools to address affordable housing needs and mitigate potential displacement impacts, including the County's recently enacted rent control and just cause eviction laws, as well as new replacement unit requirements imposed by the State.

EIGHT UNINCORPORATED COMMUNITIES

1. Altadena
2. East Pasadena-East San Gabriel
3. Kinneloa Mesa
4. La Crescenta-Montrose
5. San Pasqual
6. South Monrovia Islands
7. South San Gabriel
8. Whittier Narrows
9. South El Monte Island

Methodology and Assumptions

Real Estate data about multifamily residential and retail inventory, rents, and vacancy rates were obtained through CoStar, a third-party provider of real estate market data.

The Housing Affordability Analysis was completed using Area Median Family income limits for the Los Angeles Metropolitan Statistical Area (MSA) as defined by HUD. The Housing Affordability Analysis section includes findings related to the affordability of rental and or-sale housing in the Study Area. Housing affordability metrics, including household income and cost burden figures, are established by the U.S. Department of Housing and Urban Development (HUD). The analysis relies primarily on 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, which aligns with HUD methodology for determining eligibility criteria for affordable housing.

CHAS data provides information at the Census Tract level, rather than the smaller Block Group level.

II. Planning Area and Regional Context

Nearly all communities in Los Angeles County face affordability challenges and displacement pressures with respect to housing.

Market Conditions that affect the provision of affordable housing in the County include a wide range of factors, including high land costs, lack of available sites, zoning constraints, and political challenges, among others.

Los Angeles County Housing Affordability Goals and Targets

Los Angeles County’s recently adopted Housing Element serves as a policy guide to address the housing needs of unincorporated Los Angeles County, including the WSGVAP. The primary goal of the Housing Element is to ensure safe, sanitary, and affordable housing for current and future residents, including those with special needs.

All jurisdictions in the State of California are required to demonstrate their ability to accommodate their share of regional housing needs, which is known as the Regional Housing Needs Allocation (RHNA). For the 2021-2029 Housing Element planning period, Unincorporated Los Angeles County was assigned a RHNA of 90,052 residential units, as shown in **Table 1** below.

**TABLE 1
HOUSING NEED BY INCOME CATEGORY, 2021-2029 HOUSING ELEMENT**

	Extremely Low/ Very Low	Lower	Moderate	Above Moderate	Total
RHNA 2021-2029	25,648	13,691	14,180	36,533	90,052

SOURCES: Los Angeles County 2021–2029 Housing Element, 2022; BAE, 2023

Of this total, 25,648 units are to be set aside for households in the extremely-low- and very-low-income categories. Meanwhile, 13,691 units are to be set aside for households in the low-income category. A summary of the income ranges associated with each category can be found in the next section.

Relevant Income Categories

Table 2 displays the income limits that form the basis of the County’s housing needs assessment, which are derived from Area Median Family income limits for the Los Angeles MSA as defined by HUD.

**TABLE 2
INCOME LIMIT CATEGORIES, LOS ANGELES-LONG BEACH-GLENDALE HUD
METRO FMR AREA, 2023**

Income Limit Category	Persons in Family			
	1	2	3	4
Extremely Low (30% AMI)	\$26,500	\$30,300	\$34,100	\$40,900
Very Low (50% AMI)	\$44,150	\$50,450	\$56,750	\$63,050
Low (80% AMI)	\$70,650	\$80,750	\$90,850	\$100,900

SOURCES: U.S. Department of Housing and Urban Development (HUD); BAE, 2023

By these standards, three-person households in the Area Plan would be classified as “low income” if their annual income falls below \$90,850. The same household would be classified as “very low income” if their annual income fell below \$56,750, and “extremely low income” if it fell below \$34,100.

III. Existing Affordability Conditions

WSGVAP Multifamily Housing Inventory

There are approximately 5,320 units of multifamily housing spread across the WSGVAP, according to CoStar. Taken together, the communities of East Pasadena, Altadena, and La Crescenta-Montrose comprise over 80 percent of the Area Plan’s multifamily housing stock.

Average asking rents in all Area Plan Communities are significantly lower than those across Los Angeles County. Average rents in individual communities range from \$1,216 per month at the low end (South Monrovia Islands) to \$1,819 per month at the upper end (La Crescenta-Montrose). This compares to \$2,119 per month across Los Angeles County (including incorporated communities).

Vacancy rates in the individual communities varied between 2.4 percent and 6.7 percent as of Q3 2023, compared to 4.5 percent countywide.

**TABLE 3
EXISTING MULTIFAMILY HOUSING STOCK BY AREA PLAN COMMUNITY, Q3 2023**

WSGV Plan Area Communities	Multifamily Residential				
	Buildings	Units	Median Year Built	Vacancy	Average Rent (a)
East Pasadena - East San Gabriel	96	2,107	1960	6.7%	\$1,746
Altadena	97	1,124	1951	5.5%	\$1,626
La Crescenta	102	1,137	1954	2.4%	\$1,819
South Monrovia Islands	21	406	1960	2.8%	\$1,216
South San Gabriel	9	189	1960	n.a.	n.a.
San Pasqual	23	284	1955	3.4%	\$1,592
South El Monte Island	1	42	1946	n.a.	n.a.
Whittier Narrows	2	31	1957	n.a.	n.a.
All WSGVAP Communities (b)	351	5,320			
LA County	72,226	1,220,244	n.a.	4.5%	\$2,119

SOURCES: CoStar; BAE, 2023

NOTES:

(a) Average rent and vacancy data excluded for communities with fewer than 10 multifamily properties.

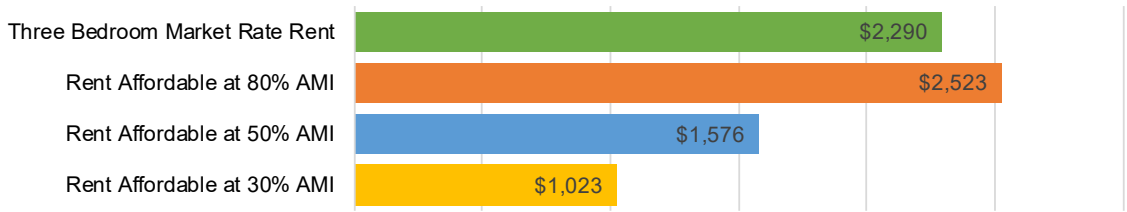
(b) As of Q3 2023, CoStar recorded no existing multifamily inventory for the community of Kinneloa Mesa.

Multifamily Affordability Summary

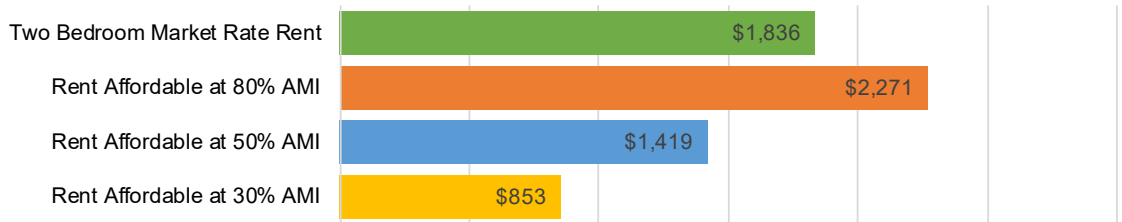
Asking rents in Area Plan exceed the reach of extremely-low- and very-low-income households, as shown in the figure below.

A four-person household earning 50 percent of the area median income (AMI) or less can only afford to pay \$1,576 per month in rent, assuming maximum affordable housing costs are set at 30 percent of gross monthly household income. The average asking rent for a three-bedroom unit in East Pasadena, however, is \$2,290 per month.

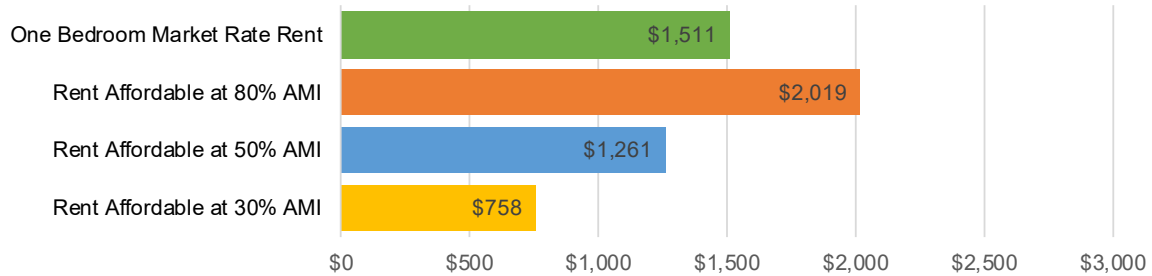
Four-Person Household (Three Bedroom), East Pasadena



Three-Person Household (Two Bedroom), East Pasadena



Two-Person Household (One Bedroom), East Pasadena



SOURCES: U.S. Department of Housing and Urban Development (HUD); CoStar; BAE, 2023

NOTES: Includes universe of multifamily units in the La Crescenta Area Plan Community as tracked by CoStar.

Figure 1
Affordability by Bedroom Count, East Pasadena, Q3 2023

The affordability gap is exacerbated even further when moving down the income ladder. A four-person household at 30 percent of AMI (e.g., extremely low income) can only afford to pay \$1,023 per month in rent. This represents an affordability gap of approximately \$1,267 per month.

As will be shown later in the brief, households classified as very and extremely low income comprise up to 41.7 percent of all renter households in the WSGVAP. These households in particular are unlikely to be able to afford market-rate rents and may face displacement risk due to recent or future rent increases.

Housing Cost Burden

The following section discusses findings related to the affordability of rental and for-sale housing in the WSGV Area Plan Communities.¹ Housing affordability metrics, including income ranges and cost burden figures, are established by the U.S. Department of Housing and Urban Development (HUD), and are based on the Area Median Income (AMI) for the Los Angeles-Long Beach-Glendale Metro Area.

The housing affordability analysis relies primarily on 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, which provides deeper insight and aligns with HUD methodology for determining eligibility criteria for affordable housing. CHAS data provides information at the Census Tract level, rather than the smaller Block Group level.

- As shown in **Table 4**, the Area Plan Communities contain significantly more owner households than renter households (32,775 versus 17,495). The largest segment across owner households, as well as total households, is owner households in the Above Moderate-Income category. This category is made up of 14,532 households (44.3 percent of all owner households) and is over three times as populated as any other income category across owner and renter households.
- Renter households in the Area Plan Communities are more likely to belong to the Extremely-Low- or Low-Income categories, making up 24.8 percent and 22.7 percent of all renter households, respectively.
- 35.6 percent of renter households in the Area Plan Communities belong to the Median, Moderate, and Above Moderate-Income categories. For a family of three, this translates into \$106,050 per year and above, according to FY 2023 Income Limits for the Los Angeles-Long Beach-Glendale Metro Area.

Housing affordability becomes a problem when there is a deficit of housing units that can accommodate a region's households at costs that are proportionate to their incomes. According to HUD standards, households paying more than 30 percent of their gross annual income for housing costs are considered "cost-burdened."

As shown in **Table 5**, 38.0 percent of all households in the Area Plan Communities are considered cost-burdened (48.8 percent of renter households and 32.3 percent of owner households). When compared to Los Angeles County however, the cost-burden among households in the Area Plan Communities is relatively low. In Los Angeles County, approximately 46.8 percent of all households are considered cost-burdened according to the most current estimate.²

¹ CHAS data for the WSGVAP Communities is provided at the Census Tract Level rather than the smaller Block Group level, resulting in a slightly larger geography. The WSGVAP Communities in this case are made up of the following Census Tracts: 3001, 3002, 3005.01, 3005.03, 4302, 4311, 4312, 4313, 4314, 4315.02, 4318, 4331.03, 4600.01, 4601.01, 4602, 4603.01, 4603.02, 4610, 4611, 4612, 4613, 4631.03, 4633, 4800.02, 4800.11, 4800.12, 4801.02, 4812.03, 4824.04, 4825.21, 4825.22, 5003, and 9800.36.

² U.S. Census Bureau, Burdened Households (5-year estimate) in Los Angeles County, CA [DP04ACS006037], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/DP04ACS006037>, December 6, 2023.

TABLE 4
DISTRIBUTION OF STUDY AREA HOUSEHOLDS BY HUD AREA MEDIAN FAMILY INCOME LEVEL, WEST SAN GABRIEL VALLEY AREA PLAN COMMUNITIES, 2016–2020

% of HUD Area Median Family Income (a)	Renter Households		Owner Households		All Households	
	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income (≤30% HAMFI)	4,345	24.8%	3,135	9.6%	7,480	14.9%
Very Low Income (>30%, ≤50% HAMFI)	2,963	16.9%	3,180	9.7%	6,143	12.2%
Low Income (>50%, ≤80% HAMFI)	3,974	22.7%	5,300	16.2%	9,274	18.4%
Median Income (>80, ≤100% HAMFI)	1,539	8.8%	3,679	11.2%	5,218	10.4%
Moderate Income (>100%, ≤120% HAMFI)	1,534	8.8%	2,955	9.0%	4,489	8.9%
Above Moderate Income (≥120% HAMFI)	3,156	18.0%	14,532	44.3%	17,688	35.2%
Total Households (b)	17,495	100.0%	32,775	100.0%	50,280	100.0%

SOURCES: U.S. Department of Housing and Urban Development, 2016–2020 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2023

NOTES:

- (a) "HAMFI" is the HUD Area Median Family Income for the Los Angeles-Long Beach-Glendale HUD Metro FMR Area.
- (b) Totals do not equal the sum of individual figures due to independent rounding.
- (c) The West San Gabriel Valley Communities are made up of the following Census Tracts: 3001, 3002, 3005.01, 3005.03, 4302, 4311, 4312, 4313, 4314, 4315.02, 4318, 4331.03, 4600.01, 4601.01, 4602, 4603.01, 4603.02, 4610, 4611, 4612, 4613, 4613.03, 4633, 4800.02, 4800.11, 4800.12, 4801.02, 4812.03, 4824.04, 4825.21, 4825.22, 5003, and 9800.36.

TABLE 5
HOUSING COST BURDENS BY INCOME BRACKET AND TENURE, WEST SAN GABRIEL VALLEY AREA PLAN COMMUNITIES, 2016–2020

Housing Cost Burden by Income Level	Renter Households		Owner Households		All Households	
	Number	Percent	Number	Percent	Number	Percent
Household Income ≤30% HAMFI (a) (b)	4,345	100.0%	3,135	100.0%	7,480	100.0%
With ≤ 30% Housing Cost Burden	508	11.7%	608	19.7%	1,116	15.0%
With > 30%, but ≤ 50% Housing Cost Burden	301	6.9%	503	16.3%	804	10.8%
With > 50% Housing Cost Burden	3,209	73.9%	1,854	60.0%	5,063	68.1%
Not Computed (No or Negative Income)	325	7.5%	125	4.0%	450	6.1%
Household Income >30% to ≤50% HAMFI (b)	2,963	100.0%	3,180	100.0%	6,143	100.0%
With ≤ 30% Housing Cost Burden	481	16.3%	1,368	43.0%	1,849	30.2%
With > 30%, but ≤ 50% Housing Cost Burden	1,187	40.3%	508	16.0%	1,695	27.7%
With > 50% Housing Cost Burden	1,279	43.4%	1,305	41.0%	2,584	42.2%
Household Income >50% to ≤80% HAMFI (b)	3,974	100.0%	5,300	100.0%	9,274	100.0%
With ≤ 30% Housing Cost Burden	2,199	55.2%	2,510	47.4%	4,709	50.7%
With > 30%, but ≤ 50% Housing Cost Burden	1,514	38.0%	1,603	30.3%	3,117	33.6%
With > 50% Housing Cost Burden	274	6.9%	1,184	22.4%	1,458	15.7%
Household Income >80% to ≤100% HAMFI (b)	1,539	100.0%	3,679	100.0%	5,218	100.0%
With ≤ 30% Housing Cost Burden	1,199	77.1%	2,224	60.3%	3,423	65.3%
With > 30%, but ≤ 50% Housing Cost Burden	329	21.1%	1,181	32.0%	1,510	28.8%
With > 50% Housing Cost Burden	28	1.8%	282	7.6%	310	5.9%
Household Income >100% to ≤120% HAMFI (b)	1,534	100.0%	2,955	100.0%	4,489	100.0%
With ≤ 30% Housing Cost Burden	1,233	81.7%	2,210	74.4%	3,443	76.9%
With > 30%, but ≤ 50% Housing Cost Burden	272	18.0%	616	20.7%	888	19.8%
With > 50% Housing Cost Burden	4	0.3%	143	4.8%	147	3.3%
Household Income >120% HAMFI (b)	3,156	100.0%	14,532	100.0%	17,688	100.0%
With ≤ 30% Housing Cost Burden	3,008	95.2%	13,121	90.3%	16,129	91.2%
With > 30%, but ≤ 50% Housing Cost Burden	114	3.6%	1,292	8.9%	1,406	7.9%
With > 50% Housing Cost Burden	39	1.2%	117	0.8%	156	0.9%
Total Households (b)	17,495	100.0%	32,775	100.0%	50,280	100.0%
With ≤ 30% Housing Cost Burden	8,628	49.3%	22,041	67.3%	30,669	61.0%
With > 30%, but ≤ 50% Housing Cost Burden	3,717	21.2%	5,703	17.4%	9,420	18.7%
With > 50% Housing Cost Burden	4,833	27.6%	4,885	14.9%	9,718	19.3%
Not Computed (No or Negative Income)	325	1.9%	125	0.4%	450	0.9%

SOURCES: U.S. Department of Housing and Urban Development, 2016–2020 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2023

NOTES:

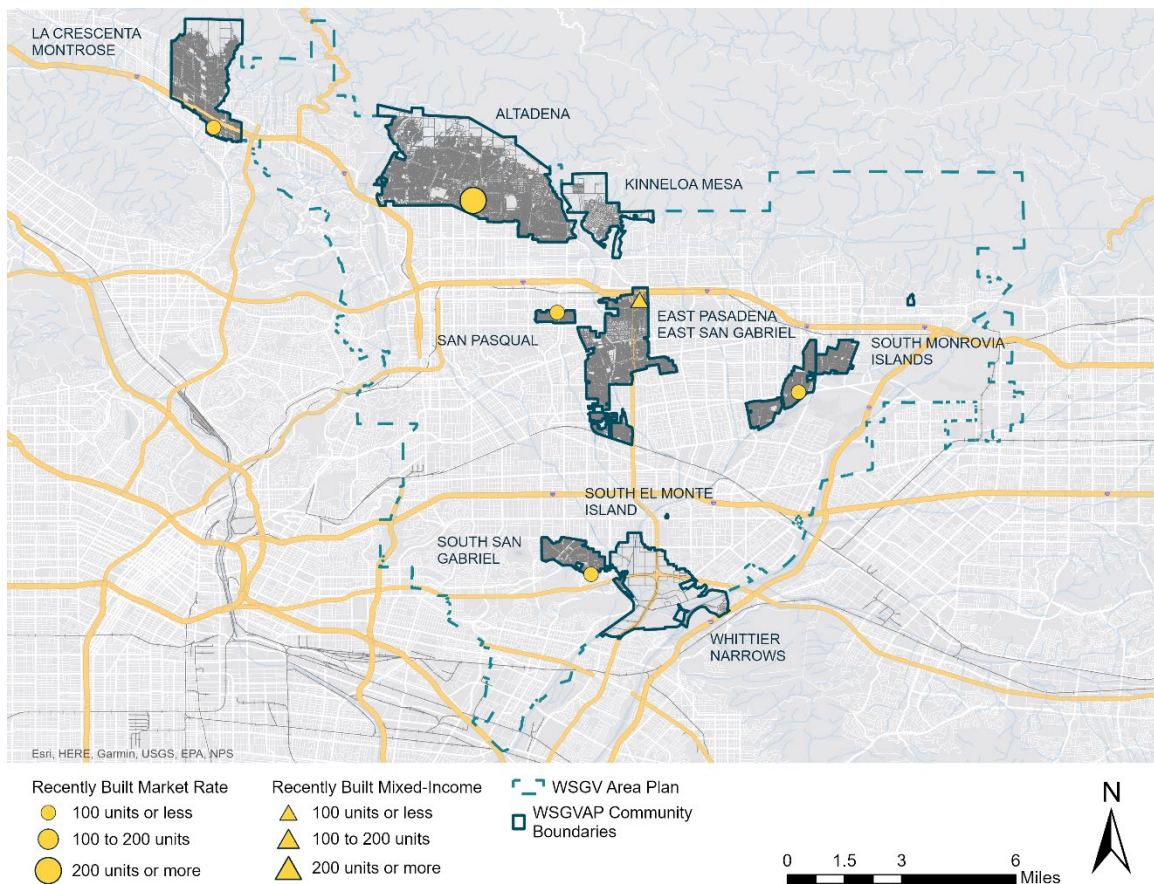
- (a) "HAMFI" is the HUD Area Median Family Income for the Los Angeles-Long Beach-Glendale HUD Metro FMR Area.
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Nonetheless, providing a range of affordable units along with market rate units will be critical in the ongoing success of the Area Plan Communities.

Affordable Housing Production Trends

Map 1 displays all multifamily projects constructed in the WSGVAP within the last 10 years, as reported by CoStar. Projects are displayed by affordability type, with “Market Rate” projects represented by circles and “Mixed-Income” projects represented by triangles.

- Five of the six multifamily projects built in the WSGV Area Plan Communities in the past 10 years, are comprised of Market Rate units, and not units affordable to lower-income households
- The only recent “Mixed-Income” multifamily housing project are the “RinRose Apartments,” as mentioned above, which were completed in 2023.
- Zero projects classified as “100% Affordable” have been built anywhere in the WSGV Area Plan Communities in the last 10 years.



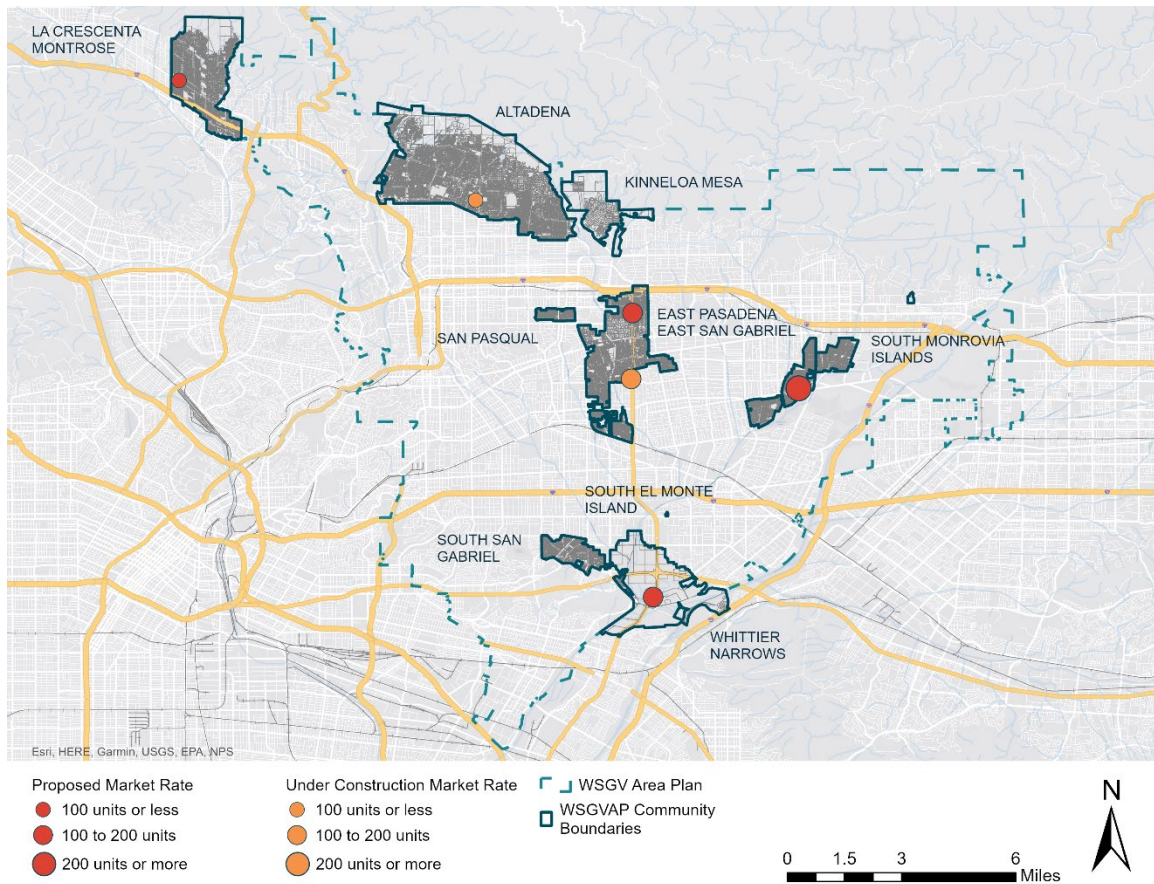
SOURCES: CoStar; BAE, 2023

Map 1
Recently Built Multifamily Projects by Affordability Type, 2013–2023

Map 2 displays Pipeline Projects in the WSGV Area Plan Communities, as reported by CoStar.

“Under Construction” projects are displayed in orange, while “Proposed” projects are displayed in red. Projects that are classified as Under Construction have typically secured a Building Permit and are further along in the entitlement process.

- There are zero pipeline projects classified as “100% Affordable” anywhere in the WSGV Area Plan Communities.
- Additional research may be needed to determine whether any of the Market Rate Projects in the pipeline are subject to the County’s recently adopted Inclusionary Housing program (discussed in further detail below).



SOURCES: CoStar; BAE, 2023

Map 2
Proposed and Under Construction Multifamily Projects by Affordability Type, 2023

IV. Opportunities and Constraints

The following section summarizes some of the opportunities and constraints related to displacement risk for the Area Plan noted in this Brief.

Constraints

Comparative Lack of Affordable Projects in the WSGVAP

Based on an in-depth review of deed-restricted affordable housing projects across unincorporated Los Angeles County, only three affordable projects are located within the Area Plan, with all geared towards Seniors. These include the following:

- Friends Retirement Center, a restricted Senior property located at 2691 North Lincoln Avenue
- Jasmine Court, a restricted Senior property located at 1301 Potrero Grande Drive in South San Gabriel
- Altadena Vista Senior Apartments, a restricted Senior property located at 815 E Calaveras Street in Altadena

These three projects comprise 68 deed-restricted units, or 2.6 percent of the total number of deed restricted units found in Los Angeles County’s unincorporated communities.

Notably, none of these projects are geared towards non-senior populations such as lower-income families, veterans, or homeless individuals. In addition, no affordable multifamily projects appear to be in the development pipeline.

Opportunities

Despite the lack of deed-restricted affordable housing options for lower-income families residing in the WSGVAP, market-rate units are still relatively affordable when compared to the wider County. This is underscored by the fact that in most cases, families classified as “low income” (e.g., up to 80 percent AMI) are able to afford the market rent for units associated with their household size.

This perhaps underscores the need to target production efforts to those families in the extremely-low- and very-low-income categories instead. Potential incentives and strategies to attract additional affordable housing opportunities will be included in the Economic Development Element.

- “Market/Affordable” or “Mixed-Income” projects represent the next most common share of multifamily housing in the Area Plan Communities, with 209 units, or 3 percent of total WSGVAP Community housing stock as tracked by CoStar.
 - A recent example of a “Mixed-Income” project in the West San Gabriel Valley Area Plan Communities are the “RinRose Apartments,” located at 3768 E. Colorado Blvd in East Pasadena. The project is a 100-unit development and includes five deed-restricted affordable units. The project was completed in 2023, as recorded by CoStar.

V. Existing Applicable Tools, Strategies, and Incentives

The following section identifies existing tools to address affordable housing needs and mitigate potential displacement impacts, including the County's recently enacted rent control and just cause eviction laws.

The forthcoming WSGVAP Economic Development Element will ultimately recommend a series of more tailored complementary programs and policies to support the protection, preservation, and production of affordable housing in the Area Plan in accordance with County goals. The strategy will outline an approach to mitigating potential displacement impacts associated with the Plan Update for incorporation into the final Plan.

New Rent Control and Just Cause Eviction Laws

The Department of Consumer and Business Affairs (DCBA) enforces the County's Rent Stabilization Ordinance, which became effective in 2020. In addition to limiting annual rent increases for covered units, the Ordinance provides protections to tenants, landlords, mobile home park owners, and mobile homeowners throughout unincorporated Los Angeles County.

The Rent Stabilization Ordinance requires relocation assistance when landlords in conventional rental housing are performing certain types of repairs or are evicting tenants for certain just cause reasons. The Rental Housing Oversight Commission was established to hear appeals to determinations made by DCBA regarding potential violations of the ordinances.

New Inclusionary Housing Requirements

The County's Inclusionary Housing Ordinance, adopted in 2020, applies to all communities in the WSGVAP. Inclusionary requirements apply to nearly all new housing developments that would result in a net increase in available dwelling units.

For projects with 15 or more dwelling units, applicants are provided with 3 options to comply with the County's requirements.

- 10 percent of total project units set aside with an average affordability at 40% AMI, or
- 15 percent of total project units set aside with an average affordability of 65% AMI, or
- 20 percent of total project units set aside for 80% AMI or less.

As indicated in the previous sections, a program more tailored to the WSGVAP might omit the option to include project units at 80% AMI, since these households can already afford local market rents.

Affordable Housing Replacement Requirements

The County’s Affordable Housing Preservation Ordinance is another tool that is likely to mitigate displacement risk associated with the Plan Update. This Ordinance requires a “one-for-one” replacement of affordable units that existed on a site where new residential development is proposed, in compliance with SB 330. The Ordinance requires replacement of dwelling units that are proposed to be demolished if they are or were rent-stabilized (e.g., a “Fully Covered Rental Unit”).

This likely applies to most multifamily properties in the WSGVAP, as rental units are generally covered if their Certificate of Occupancy was issued on or before February 1, 1995.

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