

CITY OF COMMERCE

2021-2029 HOUSING ELEMENT



Draft

May 2023

Economic Development & Planning
2535 Commerce Way
Commerce, CA 90040

CHAPTER 1: INTRODUCTION

Introduction

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

Scope and Context

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

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

Relationship to Other General Plan Elements

The City of Commerce 2020 General Plan (General Plan) was adopted in January 2008. In addition to the Housing Element, the General Plan also includes the following elements: (1) Community Development, (2) Transportation, (3) Resource Management, (4) Safety and (5) Air Quality. The City is conducting a comprehensive update to the General Plan. The new update will include a new element - Environmental Justice. This Housing Element is consistent with the proposed land use policy of the General Plan update and policies in the Environmental Justice Element also help shape the City's meaningful actions to

affirmatively further fair housing. During the overall plan update, the City will ensure internal consistency among the various elements of the General Plan.

Public Outreach

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

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

The City’s General Plan Update website, www.reimaginecommerce.com, includes information on outreach opportunities, schedules and draft documents.

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

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

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

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

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

The Draft Housing Element was available for public review from May 25, 2023 through June 26, 2023. The City also held a study session with the City Council on May 30, 2023 to review the Draft Housing Element and to receive public input.

Sources of Information

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

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

CHAPTER 2: COMMUNITY PROFILE

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

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

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

Sources of Information

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

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

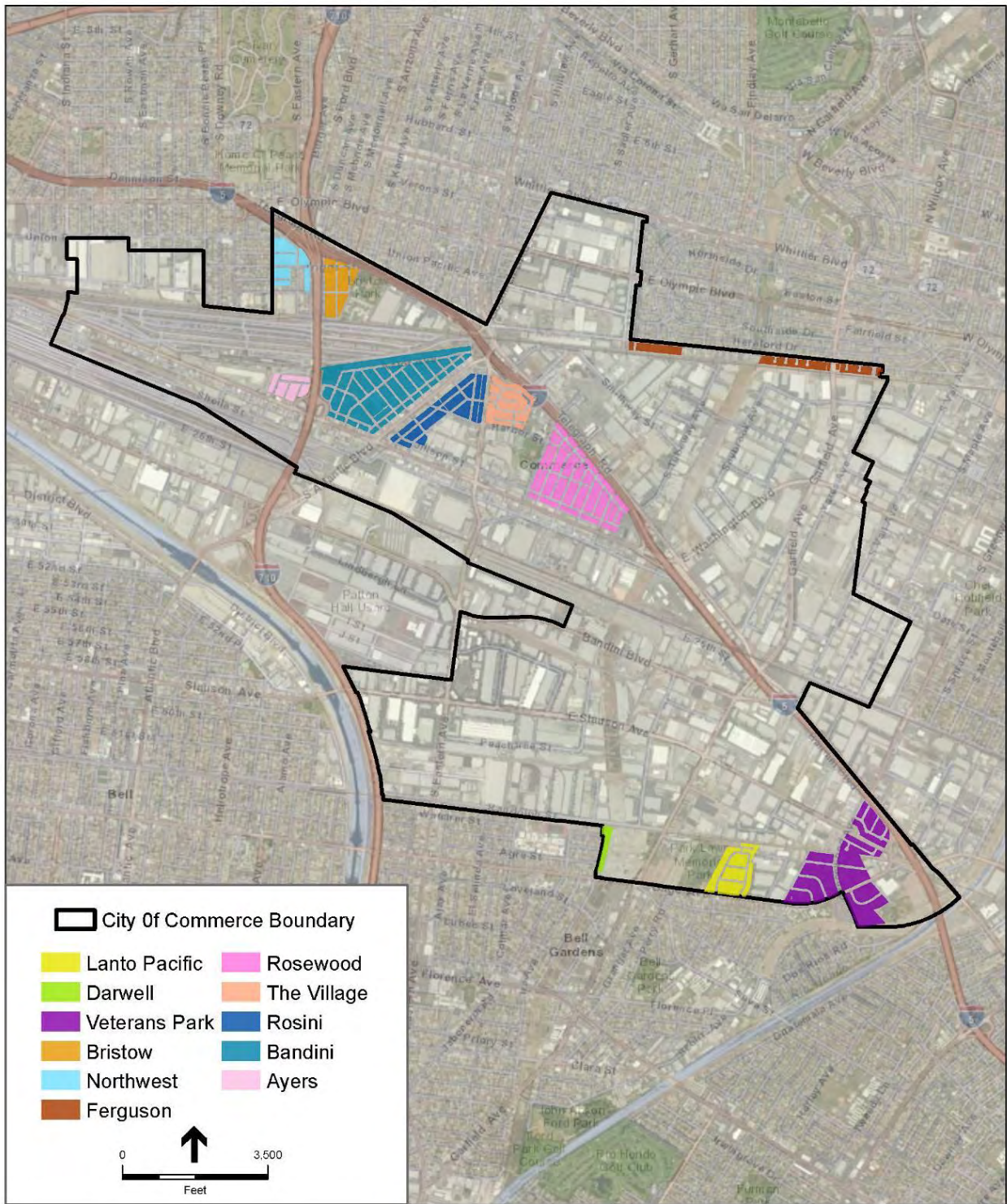
Commerce Residential Neighborhoods

Commerce has eleven established residential neighborhoods. These are listed below and shown on

Figure 2-1.

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

Figure 2-1: Commerce Residential Neighborhoods



Source: City of Commerce, ESRI Basemaps

Population Characteristics

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

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

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

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

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

Age Composition

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

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

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

Table 2-2: Age Distribution

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

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

Race/Ethnicity

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

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

Table 2-3: Race and Ethnicity

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

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

Note:

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

Employment Characteristics

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

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

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

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

Source: 2016-2020 ACS, Table S2401 and S2411

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

Table 2-5: Top Employers in Commerce

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

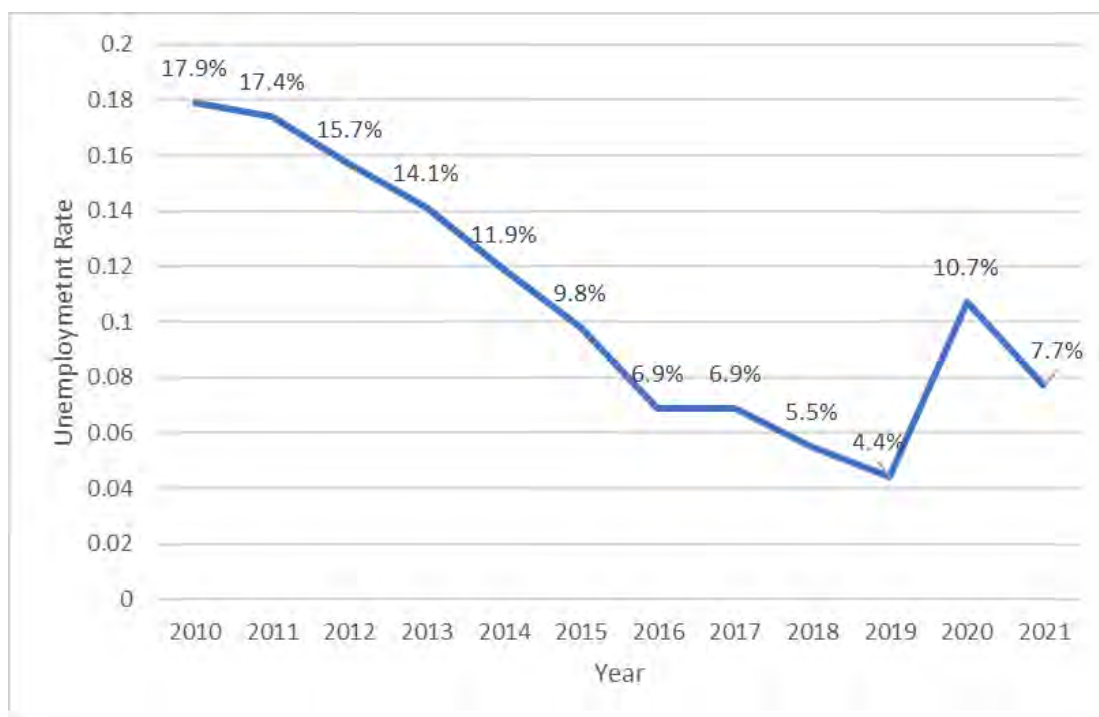
Source: City of Commerce Demographic Profile website, https://animateddemographics.com/commerce/top_employers, accessed October 2022

Unemployment

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

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

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



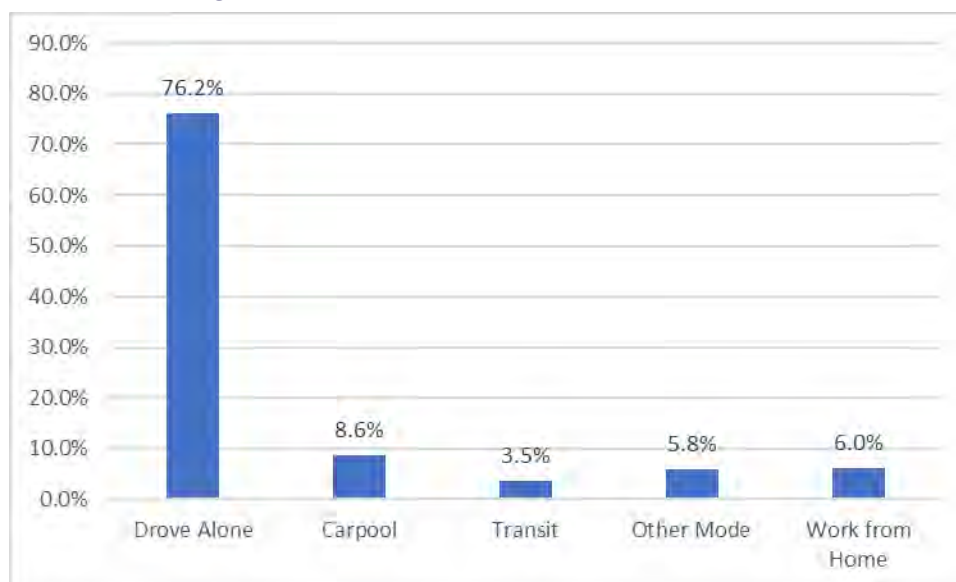
Source: California Employment Development Department (<https://www.labormarketinfo.edd.ca.gov>)

Commuting Patterns

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

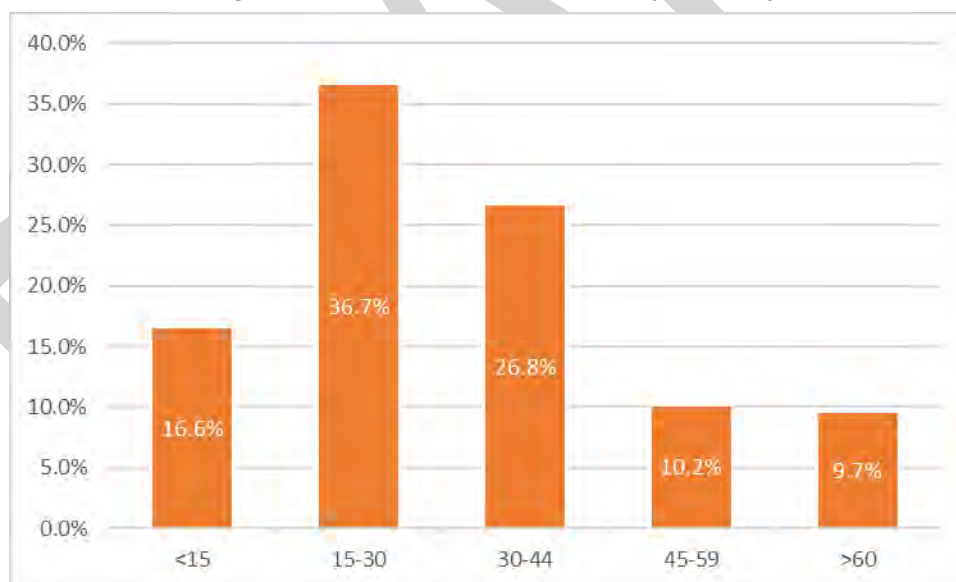
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Figure 2-3: Means of Transportation to Work



Source: 2016-2020 ACS, Table DP03

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



Source: 2016-2020 ACS, Table S0801

Household Characteristics

Household Tenure

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

Table 2-6: Households by Tenure

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

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

Household Types and Size

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

Table 2-7: Household Types

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

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

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

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

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

Source: 2016-2020 ACS, Table S1101

Overcrowding

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

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

Table 2-9: Overcrowding By Tenure

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

Source: 2016-2020 ACS, Table B25014

Housing Stock Characteristics

Housing Unit Growth and Type

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

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

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

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

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

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

Table 2-11: Housing Unit Type

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

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

Age and Condition of Housing Stock

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

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

Table 2-12: Year Structure Built

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

Source: 2016-2020 ACS, Table DP04

Substandard Housing Conditions

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

Table 2-13: Lack of Complete Facilities By Tenure

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

Source: 2016-2020 ACS, Tables B25049 and B25053

The City's Code Enforcement division is complaint driven. Code Enforcement conducted a windshield survey of the residential areas of the city and estimated that there are 180 to 200 housing units in need of rehabilitation or replacement. This represents approximately five to six percent of the City's total housing units.

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

Vacancy Rate Trends

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

Table 2-14: Vacancy Rates in Commerce

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

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

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

Housing Costs, Household Income and Ability to Pay for Housing

Household Income

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

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

Table 2-15: Household Income Level By Tenure

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

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

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

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

¹ California Department of Housing and Community Development, effective May 13, 2022.

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

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

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

Home Sales Prices

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

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

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

Source: SCAG 2021 Local Profiles Dataset Dataquick (CoreLogic)

² Data included in the SCAG 2021 Local Profile Dataset for Commerce.

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

Townhomes/Condos:

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

Single-Family Homes:

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

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

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

Source: Zillow (www.zillow.com), accessed September 2022

Rental Prices

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

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

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

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

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

Apartments:

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

Condos/Townhomes:

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

Single-Family Homes:

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

Table 2-20: Rent Survey – September 2022

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

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

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

Housing Affordability by Household Income

Housing affordability is dependent upon income and housing costs. Using set income guidelines, current housing affordability can be estimated. According to the HCD income guidelines for 2022, the median income in Los Angeles is \$91,100. (adjusted for household size). Assuming that the potential homebuyer has sufficient credit and down payment (10 percent) and spends no greater than 30 percent of their income on housing expenses (i.e., mortgage, taxes, utilities, and insurance), the maximum affordable home price and rental price can be determined. The maximum affordable home and rental prices for residents in Los Angeles County are shown in Table 2-21**Error! Reference source not found.** below.

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

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

Assumptions:

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

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

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

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

Ability to Pay for Housing/Cost Burden

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

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

Table 2-22: Cost Burden Severity

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

Source: 2016-2020 ACS, Tables B25070 and B25091

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

Table 2-23: Income by Cost Burden

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

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

Special Needs Housing

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

Table 2-24: Special Needs Populations - 2020

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

1. Some data is available at the individual (person) level and some is available at the household level. The percent column represents either as a proportion of total population or total households.

2. Agricultural Workers includes agriculture, forestry, fishing and hunting.

3. The 83 persons experiencing homelessness counted in 2022 were unsheltered, according to LSHSA.

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

Seniors

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

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

People Living with Disabilities

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

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

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

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

Table 2-25: Disability By Type

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

Source: 2016-2020 ACS, Table S1810

People Living with Developmental Disabilities

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

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

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

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

- South Central Los Angeles Regional Center, located in Los Angeles: zip code 90040

The following information from the State Department of Developmental Services (DDS) provides a closer look at the disabled population. Data shown in Table 2-26 estimates the number of individuals with developmental disabilities by zip code. It should be noted that zip code 90022 covers areas outside of the City of Commerce. Most persons experiencing a developmental disability reside in the home of a parent, family, or guardian. Independent living and supportive housing opportunities are needed for those who may be aging out of their current living situations or losing family support.

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

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

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

Source: California Department of Developmental Services, January 2022 Report

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

Large Households

Large households are defined by the U.S. Census Bureau as households containing five or more persons. As shown in Table 2-24, the 2020 ACS data shows that a quarter of Commerce households are large households. Of these 899 households, 620 (69 percent) are owner-occupied and 279 (31 percent) are renter-occupied.

Housing Units Available for Large Households

The unit sizes available in a community affect the household sizes that can access that community. Large households are generally served by housing units with three or more

bedrooms. The 2020 ACS data reflected that 1,479 occupied housing units had three or more bedrooms, accounting for 42 percent of the City's housing stock. Of these larger units, 1,167 were owner-occupied and 312 were renter-occupied.

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

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

Single-Parent Households

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

As shown in Table 2-24, there are a total of 3,503 households in Commerce, of which 576 (16 percent) are female-headed households. Of these 576 households, 279 have children under the age of 18. In 2020, there were 399 male-headed households (11 percent of total households) with 130 of these including children under the age of 18. Female-headed households are the household type that face the greatest economic challenges in Commerce. In 2020, while female headed-households in poverty comprised three percent of all Commerce households, they represented over 60 percent of the 537 Commerce households living below the poverty line.⁴

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

Agricultural Workers

The special housing needs of many farm workers stem from their low wages and the seasonal nature of their employment. Most of Commerce residents work in the Los Angeles-Long Beach Metropolitan area in non-agricultural occupations. As shown in Table 2-24, 58 farm workers and other persons in forestry and fishing occupations were identified in the City in 2020. These workers account for one percent of the City's total

⁴ See footnote 4

workforce population. These persons are likely to be employed in nurseries, stables, and not in traditional agricultural production. According to the USDA Census on agricultural population, there were 413 farms in Los Angeles County and 3,266 farmworkers. Only 22 farms in Los Angeles County hired migrant farmworkers. An estimated 395 migrant workers worked in the County. Given that Commerce has no farming activities, it is not likely there are any migrant farmworkers in the City. The demand for housing generated by farm workers in the City is thus estimated to be extremely low.

Households Living Below the Poverty Level

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

Extremely Low Income (ELI) Households

Extremely low income households are households earning 30 percent or less than the area median income (AMI). Extremely low income households are more likely to experience housing problems and cost burden. Table 2-27 shows the latest Comprehensive Housing Affordability Strategy (CHAS) data based on the 2015-2019 ACS. Approximately 24 percent of households in Commerce are extremely low income. Of these 850 households, approximately 69 percent are renters and 31 percent are owners. The table also shows that three-quarters of extremely low households in Commerce experience cost burden. Due to increases in rent and housing prices, these households will likely continue to face housing problems. The particular needs of extremely low income households are taken into consideration and are generally addressed through the City's overall programs for housing affordability and by prioritizing funding and development opportunities for projects that include housing for ELI households. The HCV program is the primary rental assistance available to extremely low income households. HUD policy requires allocating 70 percent of new vouchers to households with extremely low incomes.

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

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

*Note: Percentage is of ELI Households only

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

Individuals and Families Experiencing Homelessness

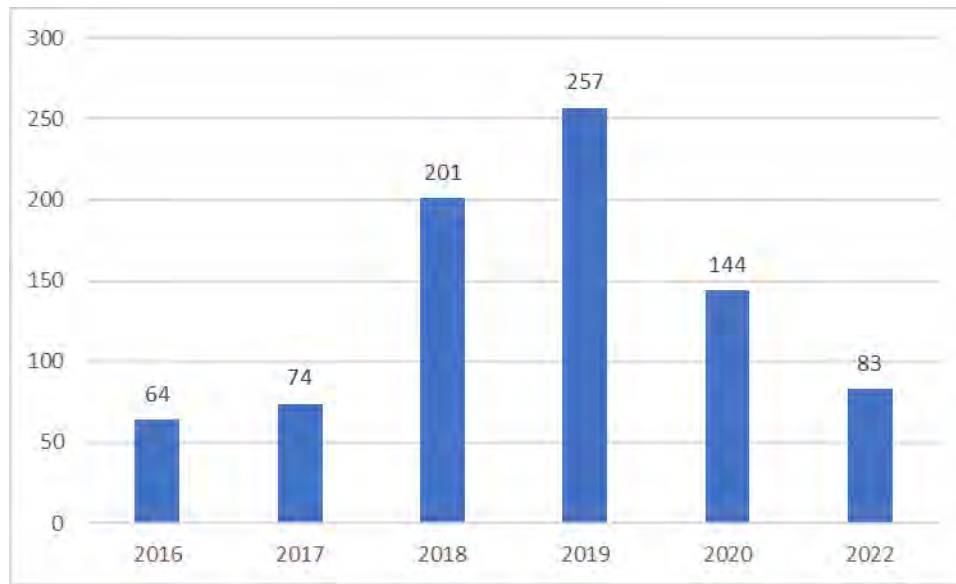
Individuals and families experiencing homelessness have immediate housing needs. Homelessness in Commerce, as in other communities, results from a combination of factors, including loss of employment, inability to find a job due to lack of skills, and high housing costs in comparison to incomes. For some, homelessness may also be the result of chronic health problems, physical disabilities, mental health disabilities, or substance abuse. While the specific nature of the factors causing homelessness may vary, there are typically three root causes:

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

The Los Angeles Homeless Services Authority (LAHSA) released their latest data in September 2022. The annual Point-in-Time (PIT) Count of people experiencing homelessness was conducted throughout Los Angeles County over several nights in February 2022. The County is divided into Service Planning Areas (SPAs) and Commerce is located in SPA 7. Figure 2-5: Unsheltered Persons in Commerce (2016-2020, 2022)* and

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

⁵ A Point in Time Count was not conducted in 2021 due to the COVID-19 pandemic.

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

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

Source: Los Angeles Homeless Services Authority Dashboard, www.lahsa.org

Table 2-28: Unsheltered Persons in Commerce - 2022

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

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

Although no homeless shelters are located in Commerce, various facilities located in the surrounding communities are available to provide shelter for homeless individuals and families. These facilities are categorized and described in Table 2-29. In Commerce, the Homeless, Engagement And Referral Team consisting of Social Services, Sheriff's Department, Public Safety, and Homeless Agency staff provides outreach, information, resources and referrals to homeless individuals in encampments, cars and RV's.

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

Organization	Services Provided
Salvation Army Bell Shelter 5600 Rickenbacker Rd. #2d Bell, CA 90201 (323) 262-1804	Temporary emergency housing and support services for individuals. Services include; general program referral and counseling, emergency shelter vouchers, transportation assistance, mental health services, food and clothing distribution, and rental and utility payment assistance.
Long Beach Rescue Mission 1335 Pacific Avenue Long Beach, CA 90801 (562) 591-1292	Emergency shelter and a 12-month substance abuse program for men and women. Up to 120 beds are provided. The length of stay varies. Provides food services to the public. Provides services for women and children.
Salvation Army 809 E. 5 th St. Los Angeles, CA 90013 (213) 626-4786	Provides 286 beds for men and women for up to a stay of one year. Provides food services to the public.
Catholic Charities - Family Shelter 123 East 14th. Long Beach, CA 90813 (562) 591-1351	Provides transitional housing for homeless men, women and children. Single residents must be elderly or disabled. Stays of up to 45 days are permitted.
Mental Health Association of Los Angeles County 100 W. Broadway, Suite 5010 Long Beach, CA 90802-2310	Temporary emergency housing and support services for individuals.
East Rancho Dominguez Community Services 4513 E. Compton, Boulevard Compton, CA 90221	Multi-purpose facility designed to enhance the community with educational, social and recreational activities. Staff and non-profit agencies provide comprehensive information and referrals, case management, utility assistance, outreach, and emergency food distribution..
Christian Outreach Appeal 515 E. Third Street Long Beach, CA 90802 (562) 436-9877	Provides programs and informational resources for homeless, seniors and single-mothers, housing opportunities and hot meals.
Catholic Charities - Family Shelter 123 East 14th. Long Beach, CA 90813 (562) 591-1351	Provides transitional housing for homeless men, women and children. Single residents must be elderly or disabled. Stays of up to 45 days are permitted.
Family Crisis Center Confidential Location Redondo Beach (310) 792-5900	Provides beds for up to 15 women with children under 18 who are victims of domestic violence. Shelter for adolescents at risk of becoming homeless is also provided. Services include referrals to homeless shelters and outpatient counseling. Stays of up to 6 months are permitted.

Organization	Services Provided
Los Angeles Mission 303 E 5 th Street Los Angeles, CA 90022 (213) 629-1227	Provides 35 beds for individuals, resources and food services to the public.
East Los Angeles Women's Center 1431 S. Atlantic Blvd. Los Angeles, CA 90022 (323) 526-5819	Provides Domestic Violence services, sexual assault services, shelter, HIV/AIDS services
Southern California Alcohol and Drug Programs, Inc. Los Angeles Area 11500 Paramount Boulevard Downey, CA 90241 (562) 923-4545	Certified Drug Medi-Cal provider offers Outpatient, residential treatment and recovery support services to Medi-Cal and My Health beneficiaries. Assistance with enrolling in Medi Cal and My Health Los Angeles is available. Other programs available: Angel Step Inn, La Casita, Positive Steps.
Comunidad Cesar Chavez 207 N. Breed Street Los Angeles, CA 90033 Open 24 hours	Bridge housing for 27 families in Boyle Heights.
Helpline Youth Counseling 1481 Telegraph Road Whittier, CA 90604 (562) 273-0722	Mental Health services, Family services, Community and Homeless services, Substance Abuse services, Counseling services.
People Assisting the Homeless 340 N. Madison Avenue Los Angeles, CA 90004 (323) 644-2200	Employment, Outreach, Homeless Prevention, Housing navigation.

Source: City of Commerce

Assisted Housing At-Risk of Conversion to Market Rate Housing

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

Table 2-30: Assisted Multifamily Rental Complexes in Commerce

Development Name	Number of Units			Type of Assistance	Covenant Start	Covenant/ Contract End
	Very Low	Low	Moderate			
Rosewood Park Senior Apts. Total Units = 94 units	18	37	0	LIHTC	2001	2029
TELACU Manor Total Units = 76 units	0	75	0	Section 202/811	1990	2029
TELACU Gardens Total Units = 24 units	0	23	0	PRAC 202/811	1998	2028
Commerce Family Homes Total Units = 10 units	10	0	0	Section 8 New Construction	1983	4/30/2024
Commerce Senior Apartments Total Units = 68 units	68	0	0	Section 8 New Construction	1980	11/30/2027
Commerce Watcher St Homes Total Units = 4 units	4	0	0	Section 8 New Construction	1979	12/19/2024
Total	100	135	0			

Source: City of Commerce, 2023

Government Code Section 65583 requires each city and county to conduct an analysis and identify programs for preserving assisted housing developments. The analysis is required to identify any low income units that are at risk of losing deed-restricted subsidies in the next 10 years. All three of the projects in the City with 153 affordable units are deemed at risk of conversion during the ten-year at-risk analysis period.

Conversion Risk

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

Preservation and Replacement Options

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

Transfer of Ownership

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

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

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

An online survey on Redfin in December 2022 shows several multi-family rental properties for sale in Commerce, Montebello and East Los Angeles, averaging \$273,729 per unit. The actual market value at time of sale will depend on market and property conditions, lease-out/turnover rates, among other factors.

Replacement of Units

The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs and type of construction. In 2020, the UC Riverside's Center for Economic Forecasting and Development reported that per-unit costs for a 75-unit development ranged from \$476,149 in Oxnard to \$579,133 in Los Angeles.⁶ Using the LA County figure from this study, replacing the 235 potentially at risk units would likely cost at least \$136 million.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Section 8 vouchers, the City through a variety of potential funding sources could provide assistance to very low income households. The level of the subsidy required to preserve the at-risk affordable housing is estimated to equal the Fair Market Rent for a unit minus the housing cost affordable by a very low income household. Table 2-31 shows the rental subsidies required for the at-risk units. As shown, subsidizing the very low income at-risk units would require approximately \$102,200 a month (\$1,226,400 annually) while the low income at-risk units would require approximately \$9,990 a month (\$119,880 annually) in subsidies.

Table 2-31: Rental Subsidies Required

Unit Size	Total Units	Fair Market Rent	Household Size	Household Annual Income	Affordable Cost (Minus Utilities)	Utility	Per Unit Subsidy	Monthly Subsidy(all units)
Very Low Income (50% AMI)								
1-BR	100	\$1,747	2	\$47,650	\$958	\$233	\$1,022	\$102,200
Low Income (80% AMI)								
1-BR	135	\$1,747	2	\$76,250	\$1,906	\$233	\$74	\$9,990
Total	235	---	---	---	---	---	---	\$112,190

Source: Veronica Tam & Associates, 2022.

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

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

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

⁶ Chong, Hoyu. (February 2020). "Economy White Paper Series: Demystifying the High Cost of Multifamily Housing Construction in Southern California." UC Riverside's Center for Economic Forecasting and Development. https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR_CEFD_Multifamily_Housing_White-Paper_3_2020.pdf

Regional Housing Need Allocation

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

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

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

Table 2-32 illustrates Commerce's RHNA by income category for the 2021-2029 planning period. Per State law, local jurisdictions are also required to provide an estimate for their projected extremely low income households (those earning 30 percent or less AMI). Jurisdictions can use half of their very low income RHNA allocation to make this projection. Therefore, Commerce is dividing the very low income allocation of 55 units in half to meet this state requirement.

Table 2-32: Housing Need by Income Category for Commerce

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

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

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

CHAPTER 3: HOUSING CONSTRAINTS

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

Governmental Constraints

Transparency In Developmental Regulations

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

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

Land Use Controls

General Plan

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

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

Community Development Element

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

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

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

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

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

Note: du/ac = dwelling units per acre

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

The City is in the process of updating the General Plan, with adoption anticipated by the end of 2023. **Error! Reference source not found.** shows the proposed land use policy's following changes to the land use designations. A key focus of the Land Use Element update is to provide additional residential and commercial opportunities in the City. This theme was prominent in the public outreach done for the General Plan between 2018 and 2023 (please See Chapter 1 and Appendix A of this Element).

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

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

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

Source: MIG, April 2023

Modelo Specific Plan

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

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

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

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

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

Density Bonus

The City's Density Bonus ordinance (Division 3 of Chapter 19.07 of the Zoning Ordinance) was last updated in 2013. Therefore, when reviewing density bonus applications, the City references and complies with Government Code §56915. This Housing Element includes a program to amend the Commerce Municipal Code to comply with the State Density Bonus law.

Residential Development Standards

The City regulates the type, location, density, and scale of residential development primarily through the Zoning Ordinance. Chapter 19.07 of the City's Municipal Code outlines the purpose of Commerce's residential zones. Following adoption of the General Plan Update by the end of 2023, the City will update the Zoning Ordinance (see **Error! Reference source not found.** above).

- *Low Density Residential Zone (R-1).* The purpose of the R-1 zone is to provide areas for the development of detached and attached single-family dwellings that

incorporate private outdoor open spaces into individual living environments. The zone is intended to protect and stabilize desirable characteristics of single-family residential areas, such as minimum lot sizes and separation from incompatible land uses.

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

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

Table 3-3: Residential Development Standards

	R-1	R-2	R-3	HOO
Density Range*	0-8.7 du/acre	8.71-14.52 du/acre (for duplex units)	21.78 du/acre	0 – 40 du/ac
Minimum Lot Area	4,000 sq. ft.	5,000 sq. ft./duplex unit; 3,000 sq.ft./unit for 2 single-family units	2,000 sq. ft./unit and not less than 7,500 sq. ft.	None required
Maximum Allowable Floor Area (all structures)	40% of the total area of the lot	1 unit = 40% of the total area of the lot. This standard does not apply to multiple units.	1 unit = 40% of the total area of the lot. This standard does not apply to multiple units.	---
Maximum Lot Coverage (including all structures, porches and patios)	45% of the total lot area (must also be within the allowable floor area)	1 unit = 45% of the total area of the lot. This standard does not apply to multiple units.	1 unit = 45% of the total area of the lot. This standard does not apply to multiple units	None

	R-1	R-2	R-3	HOO
Minimum Dwelling Size	950 sq. ft.	850 sq. ft.	700 sq. ft. (1 bedroom) 850 sq. ft. (2 bedroom) 1,000 sq. ft. (3 bedroom) 1,150 sq. ft. (4+ bedroom)	500 sq. ft. (studio) 600 sq. ft. (1 bedroom) 800 sq. ft. (2 bedroom) 1,000 sq. ft. (3 bedroom)
Maximum Building Height	25 feet (2-story)	25 feet (2-story)	35 feet or 3-story, whichever is less	60 feet or 5 stories
Distance Between Buildings (Minimum)	10 feet 5 feet – accessory bldg	10 feet 5 feet – accessory bldg	20 feet; increase of 5 ft. for every 10 ft. of height, or fraction thereof, above 25 ft.	10 feet
Front Yard Setback (Minimum)	20 feet	20 feet	15 feet	0 feet minimum, 15 feet maximum
Side Yard Setback	3 feet minimum, 5 feet maximum	3 feet minimum, 5 feet maximum	5 feet each side	5 feet minimum
Side Yard Setback-Corner Lot (Minimum)	Same as adjoining front yard, but not less than 10 feet	Same as adjoining front yard, but not less than 10 feet	10 feet where lot abuts a street	0 feet minimum, 15 feet maximum
Rear Yard Setback (Minimum)	15 feet	15 feet	15 feet	10 feet

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

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

Lot Size, Setbacks and Building Height Standards

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

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

The R-3 zone offers more flexibility in the standards, including lot coverage, height and setbacks to allow for multi-family development. The HOO zone offers even greater flexibility with reduced requirements. No minimum lot area is required and the building height (5 stories/60 feet) and reduced setbacks allow for a variety of housing designs and types to be developed. Chapter 19.47 of the Municipal Code includes additional development and design standards for live/work and mixed-use units in the HOO zone. However, the minimum unit sizes in R-3 and HOO zones may constrain the development

of micro units, live/work units, and other alternative housing arrangements such as single-room occupancy (SRO) units. This Housing Element includes a program action to review and adjust the minimum unit sizes to accommodate a range of housing unit types. There are also inconsistencies between the General Plan densities and the allowable densities under the implementing Zoning Code. State law requires that the Zoning Code implements the range of densities provided in the General Plan. For example, the R-3 zone implements the General Plan High Density Residential designation but allows a density of 21.78 units per acre, below the General Plan's 27 units per acre density envisioned. This Housing Element includes a program action to align the General Plan and Zoning Code densities. More specifically, a comprehensive Zoning Code update is needed to implement the proposed General Plan Land Use Policy. The Zoning Code update will ensure that appropriate development standards are established to facilitate the achievement of maximum allowable density in the respective zones.

Parking

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

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

Table 3-4: Commerce Residential Parking Standards

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

Source: City of Commerce Municipal Code, accessed October 2022

Table 3-5 looks at the parking requirements in surrounding jurisdictions to determine if Commerce's standards provide a constraint to development. All neighboring cities require a two-space garage for single-family homes and the cities of Downey and Maywood have similar requirements to Commerce for additional spaces for larger homes. In terms of multi-family development, Commerce is the only city that allows for one space per unit for smaller dwellings. This provides for greater flexibility in multi-family projects. The City also offers developers the option to utilize a density bonus and is flexible with required parking requirements for specific types of residents, including the elderly. It should be noted that the parking standards in the Modelo Specific Plan area are one space per bedroom (please see Table 3-6). However, the garage parking and guest parking requirements for multi-family housing may be a constraint to development. This Housing Element includes a program action to address the parking requirements.

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

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

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

Modelo Specific Plan Development Standards

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

Table 3-6: Modelo Specific Plan Development Standards

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

Source: Modelo Specific Plan, adopted February 2022.

Provision For a Variety of Housing Types

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

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

Table 3-7: Housing Types Permitted By Zone

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

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

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

1. In the PF zone, accessory dwelling unit refers to a residential unit that is accessory to a commercial or institutional use (i.e., a religious facility), not a primary residential unit. The requirements of Government Code Section 65852.2 do not apply.

2. Shelter with up to 30 occupants is permitted, more than 30 requires a conditional use permit

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

Single-Family Homes

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

Duplexes and Multi-Family Housing

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

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

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

Accessory Dwelling Units

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

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

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

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

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

Mixed-Use and Live/Work

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

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

Emergency Shelters and Low-Barrier Navigation Centers

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

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

Chapter 19.31.670 outlines the standards and regulations for emergency shelters in Commerce. A shelter with up to 30 occupants is permitted in the Light Manufacturing (M-1) Zone. A shelter with more than 30 occupants requires a conditional use permit. Other uses permitted in the M-1 zone include certain types of manufacturing, transportation-related services, job training establishments and vocational schools. A minimum distance of three hundred feet shall be maintained from any other emergency shelter and 1,000

feet from a variety of uses such as schools, parks, and senior housing. Parking is established at one space per four beds, and/or 0.5 per bedroom designated as a family unit with children, plus one space per staff member. In light of changes to State law in recent years, including AB 139 and AB 2339, the City's emergency shelter standards need to be updated to comply with new requirements as detailed later in this section.

Enacted in 2019, AB 101 requires cities to allow Low Barrier Navigation Centers (LBNCs) by-right in zones permitting multi-family and mixed-uses, if the LBNC meets specified requirements. A LBNC is defined as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. AB 101 also sets forth a specific timeline that cities must follow in the review of LBNCs. AB 101 sunsets in 2026.

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

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

As designating emergency shelters as a permitted use in the M-1 zone no longer conforms with State law (AB 2339), the City may consider allowing emergency shelters by right in the new Mixed Use or Mixed Use/Atlantic designations where multi-family, mixed use, and live/work housing, among other housing types are permitted. Based on the new AB 2339 requirement of 200 square feet of space per person, a building area of 6,000 square feet is needed for a shelter for up to 30 persons. The proposed Mixed Use and Mixed Use/Atlantic areas contain 79 parcels, totaling 52 acres. Average size of parcels in these areas is 0.66 acre. These parcels are primarily occupied by older commercial or office buildings that are single-story structures. Average existing FAR on

these properties is 0.36, significantly below the allowable FAR under the proposed General Plan update. Median age of existing structures is 1951. Furthermore, 16 parcels are vacant (including five publicly owned land and 11 privately owned land). There is sufficient capacity to accommodate the City's homeless should shelters be proposed.

Supportive and Transitional Housing

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

- Supportive Housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (per Health and Safety Code Section 50675.14(b)).
- Transitional Housing and Transitional Housing Development means temporary rental housing intended for occupancy by homeless individuals or families transitioning to permanent housing that is operated under program requirements calling for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (per Health and Safety Code Section 50675.2(h)).

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

Employee and Farm Employee Housing

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

According to the 2016-2020 American Community Survey, there were approximately 58 Commerce residents employed in agriculture related occupations. There are also no

agricultural zoning in the City or zones where commercial agricultural operations are permitted. Due to the low number of agricultural employees residing within the City, there is not a need for specialized farm employee housing beyond those provided to all lower income households.

Housing for Persons with Disabilities

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

Community Care Facilities

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

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

1. Approval of the proposed facility would result in an overconcentration of such facilities within the neighborhood where the facility is to be operated. For the purposes of this Title 19, "overconcentration" shall mean that one or more similar approved uses is located within three hundred feet of the proposed facility; or
2. The proposed facility is located within one mile of an elementary school and a person who has been convicted of a sex offense against a minor, pursuant to Section 1564 of the Health and Safety Code, resides in the facility and such residence will continue after the permit is granted; or

3. Such use cannot be sufficiently conditioned to make it compatible with surrounding uses.

Pursuant to Section 19.07.120 of the Commerce Municipal Code, “a community care facility or group home which serves six or fewer residents shall be considered a residential use of property” and is not subject to the standards which apply to larger facilities which house seven or more clients. Therefore, small facilities that house six or fewer clients are permitted by right in the City’s residential zones. However, residential care facilities for seven or more are not permitted or conditionally permitted in zones that permit housing.

Definition of Family

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

Building Code

The City complies with the Federal Americans with Disabilities Act (ADA) and the most recent California Building Code regulations.

Reasonable Accommodation

Commerce Municipal Code Chapter 19.07, Division 4 provides a formal procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. Applicants may request a reasonable accommodation in zoning and other land use regulations, policies, practices and procedures per the Municipal Code. The Community Development Director or an appointed designee has the authority to review and decide upon requests for reasonable accommodation. The Community Development Director or appointed designee may refer the matter to the planning commission, as appropriate. The required findings of approval include:

1. The housing, which is the subject of the request, will be used by an individual disabled as defined under the acts.
2. The requested reasonable accommodation is necessary to make specific housing available to an individual with a disability under the acts.
3. The requested reasonable accommodation would not impose an undue financial or administrative burden on the city.
4. The requested reasonable accommodation would not require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning.

5. The requested reasonable accommodation would not adversely impact surrounding properties or uses.
6. There are no reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the city's applicable rules, standards and practices.

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

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

The required finding relating to adverse impact on surrounding properties or uses can be considered subjective and constraining to the development or improvement of housing for persons with disabilities. This Housing Element includes a program action to remove the subjective finding.

Planning and Development Fees and Processing

Fees

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

Development impact fees are also collected for development projects. In accordance with California law, these are collected at the time the City issues certificates of occupancy. The Montebello Unified School District (MUSD) and Los Angeles Unified School District (LAUSD) both levy a school development fee for residential construction. These fees are paid directly to the County by the project applicant.

To better illustrate the development fees for residential units in the City, Table 3-9 generally provides the total fees charged per unit for both single family and multi-family developments. In general, the City's fee structure charges lower fees for multi-family housing construction on a per unit basis.

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

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

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

Table 3-9: Development Fees Per Residential Unit

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

Source: City of Commerce 2023

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

*Multi Family Development: Rosewood Village Project at 5625 Jillson Ave); 3-story, 7-unit townhome project

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

Development Review and Processing

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

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

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

Site Improvements

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

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

As stated in the General Plan Transportation Element,

“there are limited opportunities for roadway widening or the construction of new thoroughfares. Instead, new roadway improvements will be limited to intersection enhancements, and passive improvements, such as signalization synchronization.”²

The Modelo Specific Plan includes the layout for streets, sidewalks and other improvements in the Plan area due to the intensification of uses on site. The Rosewood Village Residential Development project included the following mitigation measures related to transportation and parking³:

- MM Traf-1: Prior to occupancy of the first building, the developer and City shall enter into a shared parking agreement that covers all three Project sites and the four parking zones notes.

² City of Commerce General Plan, adopted January 2008, p. 56.

³ City of Commerce, Rosewood Village Residential Project Mitigation Monitoring Program

- MM Traf-2: Prior to any lane closure or detour, the developer shall submit a Construction Traffic Management Plan for review and approval by the City Engineer.
- MM Traf-3: Prior to Occupancy of Site 1B and Site 2, approximately 376 feet of red-curb shall be painted along Jillson Street as the access point to the Project.

Non-Governmental Constraints

Construction Costs

Construction costs have a significant impact on the cost of new housing. One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not account for regional differences nor include the price of the land upon which the building is built. Building Valuation Data, dated February 2021, reports the national average for development costs per square foot for apartments and single-family homes as follows⁴:

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

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

⁴<https://cdn-web.iccsafe.org/wp-content/uploads/BVD-BSJ-FEB21.pdf>

Land Costs

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

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

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

Availability of Financing

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

Table 3-10: Disposition of Home Loans (2021)

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

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

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

Identified Densities and Approval Time

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

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

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

Environmental Constraints

Seismic Hazards

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

Flooding

The Federal Emergency Management Agency (FEMA) publishes maps that identify areas of the City subject to flooding in the event of a major storm. These Flood Insurance Rate Maps (FIRMs) indicate areas that may be inundated in the event of a 100-year or a 500-year storm. In addition, the maps indicate the base flood elevations at selected intervals of the floodway. Commerce lies within the dam inundation area of the Garvey Reservoir in Monterey Park. Dam rupture could result in the flooding of areas between Eastern Avenue and Garfield Avenue. The Ferguson neighborhood and portions of the Rosewood neighborhood could be affected by the flooding. Areas that are designated for future residential development do not fall within the 100-year floodplain and are not subject to specialized flood construction requirements.

Fire Hazards

The most serious fire threat within the City is building and structure fires. Since Commerce is built out, and located within central Los Angeles County, it does not have the same risk of fires from accumulated brush and vegetation that cities on the urban fringe experience. Other fire hazards within the City may be associated with heavy industrial uses, older commercial and residential structures, the presence of hazardous materials, and arson.

Noise

Residential land uses are sensitive to loud noises. State noise guidelines recommend that residential development be located in areas exposed to ambient outdoor noise levels no greater than 65 A-weighted decibels (dBA). A citywide noise inventory performed in October 2005 found that virtually all of the neighborhoods in Commerce are located in areas where noise levels exceed 65 dBA. The City's noise environment is not expected

to significantly change over time since the primary factors contributing to noise, the I-5 and I-710 Freeways, the railway freight lines, the railroad yard, and local truck traffic, will have a continued presence in the City.

The General Plan FEIR identifies Community Development and Health and Safety policies that are designed to protect sensitive uses (such as housing) from excessive noise impacts. First, noise sensitive land uses are generally prohibited from being sited in areas characterized by high ambient noise levels. Second, land uses that generate excessive noise levels may not be permitted near sensitive land uses. Finally, the General Plan promotes measures that will reduce noise exposure through the use of site planning and construction techniques. These policies are implemented by the City through its standard environmental review process that requires preparation of noise impact studies, as necessary.

All new residential development will need to meet General Plan Noise Element and State guidelines for exterior and interior ambient noise levels. Compliance with these guidelines may require more expensive construction techniques, which may in turn increase housing costs.

Air Quality

Given the composition of land uses in the City, the 2020 General Plan establishes a set of strategies to enable industrial activities and businesses to coexist with residential uses. Specifically, a major consideration in land use decisions is an evaluation of how stationary emissions from these businesses can be mitigated so they do not impact sensitive receptors. In addition to emissions generated by local businesses the City also experiences high volumes of truck traffic and railways running through the City to accommodate goods movement. Both rail and truck traffic can generate significant amounts of particulate matter which contribute to a less than ideal environment for residential uses. Furthermore, the City of Commerce is also bisected by two freeways: Interstate 5 which runs generally in an east-west orientation and Interstate 710 which runs north-south. It is not recommended that housing be located within 500 feet of freeways to avoid long term exposure to particulate matter for long term residents. Generally, the City is aware of potential air quality impacts on future residential development and has been careful to identify opportunity areas for residential development that are less impacted than other areas of the City. It is important to understand the existing environment and conditions present in the City with regard to housing, as the options for safe and healthy sites within the City are limited based on the industrial activity established in the City.

Hazardous Materials

As the City of Commerce is primarily made up of industrial uses, it is important to ensure that sites that are identified and developed with housing are appropriate and safe. According to the California Department of Toxic Substance Control, in 2013, no parcels within the Housing Opportunity Overlay were identified on the Hazardous Waste and Substances Site List or the State Water Resources Control Board (SWRCB) list of cleanup sites. Despite this, future housing development or redevelopment will be reviewed on a project-by-project basis as part of the City's standard environmental review process to determine, if any, site contamination and the degree of remediation required. This is consistent with the policies of the General Plan Safety Element and the findings of the General Plan FEIR. It is possible that additional analysis may be required, including a soils analysis, to ensure that sites are safe for residential development, which can add cost and time to the development process. The City of Commerce will work with developers to streamline the process and provide funding, when possible.

CHAPTER 4: HOUSING RESOURCES

This section describes and analyzes the resources available for development, rehabilitation and preservation of housing in Commerce. This includes the availability of land resources and the ability to satisfy the City's share of the regional housing need, and financial resources available to support the provision of affordable housing. Financial resources for housing activities and energy conservation resources to reduce utility costs are also included in this chapter.

Regional Housing Needs Assessment (RHNA)

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

- The State Department of Housing and Community Development (HCD) uses the California Department of Finance (DOF) growth projection and other factors to determine the number of housing units that are needed statewide over an eight-year planning period (for Commerce and other Southern California jurisdictions, this time period is years 2021-2029).
- This statewide housing unit number (called the Regional Housing Needs Determination, or RHND), is divided into regions. Commerce is located within the Southern California Association of Government (SCAG) region.
- SCAG is responsible for creating a methodology to distribute the RHND among all of its cities and counties. Each jurisdiction's housing unit number is called the Regional Housing Needs Allocation (RHNA).
- The RHNA is the number of units that a jurisdiction must plan for in the Housing Element update. The units are divided into four different categories based on median income: very low (earn ≤ 50 percent of the area median income, or AMI), low (earn between 51 and 80 percent of AMI), moderate (earn between 81 and 120 percent of AMI) and above moderate (earn more than 120 percent of AMI).
- Almost all jurisdictions in the SCAG region received a significantly larger RHNA this cycle compared to the last housing element cycle, primarily due to changes in state law that led to a considerably higher RHND compared to previous cycles.

RHNA for Commerce

For the 2021-2029 Housing Element, the City of Commerce has been assigned a RHNA of 247 new units by SCAG. To ensure the City meets this minimum, a 15 to 30 percent buffer is recommended by HCD to account for the “No Net Loss” requirement as mandated by SB 166. Pursuant to SB 166, while the RHNA is not a production obligation, but if sites are not developed at the density or income level identified in the Housing.

This allocation is distributed into four income categories, as shown below in Table 4-1. The RHNA includes an equity adjustment which allocates future (construction) need by each income category in a way that meets the State mandate to reduce the over-concentration of lower income households in one community. For Commerce, because the City has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy.

Table 4-1: Housing Needs for 2021-2029

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low/Very Low (50% or less)*	55	22.3%
Low (51 to 80%)	22	8.9%
Moderate (81 to 210%)	39	15.8%
Above Moderate (Over 120%)	131	53.0%
Total	247	100.0%

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

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

Development Credit and Remaining Need

While the Housing Element covers an eight-year planning period, starting on October 15, 2021, and ending on October 15, 2029, the RHNA projection period began on June 30, 2021. Therefore, projects that are under construction (but not yet finalized), have received entitlement, been approved, under review, or with pending applications as of June 30, 2021 can be credited as progress toward the RHNA. Table 4-2 summarizes Commerce’s credits and the remaining housing need through October 15, 2029.

Table 4-2: RHNA Credits and Remaining Need

Income Category (% of County AMI)	RHNA	Potential ADUs	Bldg Permit Issued	Entitled	Remaining Need
Extremely Low (50% or less)	28	2	0	0	26
Very Low (31-50% AMI)	27	1	0	0	26
Low (51 to 80%)	22	7	0	0	15
Moderate (81 to 210%)	39	1	0	0	38
Above Moderate (Over 120%)	131	5	31	102	0
Total	247	16	31	102	105

Projected Accessory Dwelling Units (ADUs)

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

Entitled Projects

In October 2020, the Commerce City Council approved the Rosewood Village project. A three-parcel project developed with various commercial and industrial uses. The sites are located in the Rosewood Village neighborhood, adjacent to City Hall. In April 2021, 31 permits were issued for Site 1B, located at 5625 Jillson Street (Jillson Street and Valentina Way). These 31 attached townhomes are located near the Rosewood Park and Library. Site 1B is an asymmetrical-shaped lot approximately 1.33-acre in size. The site is flat and currently developed with a one and one-half story, 19,629-square-foot, light industrial,

warehouse and attached office building constructed in 1949 and associated asphalt parking area, which is also used as a transitional storage area for miscellaneous household debris, and known as the Provisor Building. Three of the units will be reserved for workforce housing for middle income households (up to 175 percent AMI).

The other two sites of the Rosewood Village project are currently being processed. Site 1A (5550 Harbor Boulevard) has gone through plan check and is awaiting issuance of building permits. This site is approximately 1.98-acre in size and is currently developed with a one and one-half story, 27,376-square-foot office building built in 1956, known as the North Annex along with an asphalt parking lot associated with the Aquatic Center. Plan check has been completed for 37 attached single-family units. Three of these units will be reserved for workforce housing for middle income households (175 percent AMI).

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

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

Remaining RHNA

After accounting for ADUs and entitled projects, and project under review, the remaining need is 99 units. HCD also recommends that jurisdictions identify enough residential capacity within their boundaries that is above and beyond the required housing numbers identified in lower income categories, to help offset sites that may (or may not) be developed during the planning period. Based on HCD guidance and review of other Housing Elements, a “buffer” or margin of safety of at least 15 percent above the City’s remaining RHNA allocation for the lower and moderate-income categories.¹ The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029. To

¹ No Net Loss requires cities to demonstrate that capacity is available for affordable units throughout the 8-year planning period, including when a proposed development on a specific site result in fewer units than were assumed to be possible on that site in the Housing Element Sites Inventory (Government Code Section 65863, “No Net Loss” requirements).

accomplish this, the Residential Sites Inventory was developed and is described in further detail in the following section.

Residential Sites Inventory

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

"Default density" is a feature of state law and is a very important component of the methodology for the capacity analysis. The RHNA is divided into different income levels, as a jurisdiction needs to show its intent to provide housing for households of various income levels (SCAG determines the calculation methodology and number of units per income category). To assess this from a planning perspective, a "default density" is assigned to determine the number of units that could be counted in individual income categories. Generally speaking, the higher the potential density of a site, the more affordable the resultant development will be and the lower the income level it will be assigned to. Default density is therefore used for the purpose of assessing whether a jurisdiction can meet its RHNA, but actual development circumstances may vary.

The City assessed a number of sites that would be realistic candidates for infill residential development to fulfill the RHNA. To ensure a meaningful analysis, a list of criteria was developed to identify only properties that had realistic development potential. A review was conducted on the City's parcels, including environmental constraints (such as pollution), potential residential displacement and the City's existing land use, zoning, and development standards. See Appendix C for the list of criteria and details for identified sites. In addition, information obtained during the General Plan Update public outreach process was considered. Key take aways included (Please see Section 1 and Appendix A of this Element for additional public outreach information:

- Commerce is behind in residential development

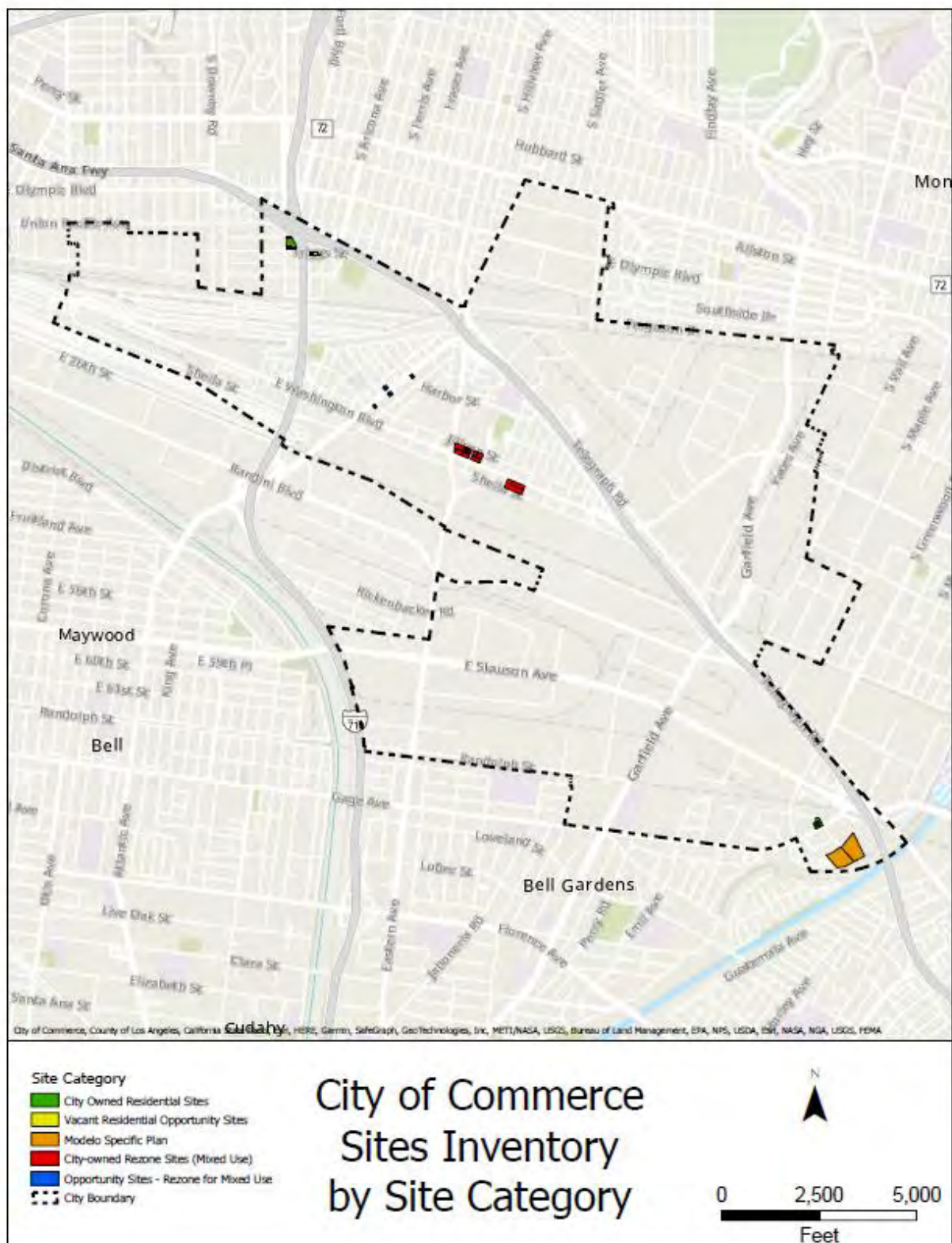
- Northwest and Bristow areas were identified as locations to have additional residential uses over time
- Denser residential development is a priority to provide different housing options
- Housing for young adults wanting to move back to Commerce is needed
- Investigate sites for housing in the Veterans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

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

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

Appendix C of the Housing Element includes information about each site. A brief summary of the five sites inventory categories is included below. Figure 4-1 shows Commerce's Site Inventory by category.

Figure 4-1: Commerce Sites Inventory



Modelo Specific Plan

The Modelo Specific Plan, approved by the City Council in February 2022, outlines the redevelopment of the existing Veterans Memorial Park located at 6364 Zindell Avenue, and an adjacent vacant parcel at 7316 E. Gage Avenue (collectively, the “Project Site”). The parcel located at 7316 Gage Avenue is planned to have entertainment, retail and community spaces due to its proximity to the freeway. Under the Specific Plan, the remaining 9.72 acres of the Project Site will include the construction of up to 850 residential units. These residential units will be on the central and western portions of the Specific Plan area. The development agreement commits the project to provide 10 percent (85 units) in the Specific Plan as workforce housing, affordable to middle income households (up to 175 percent AMI). For the purpose of RHNA credits, all 850 units are assigned to above moderate income level. Table 4-3 shows the approximate income breakdown for the residential units. All 850 units can be developed with the eight-year time frame of the Housing Element.

Table 4-3: Modelo Specific Plan Residential Units

Parcel Size and Estimated Density (du/acre)*	Extremely Low/Very Low Income	Low Income	Moderate Income	Above Moderate Income**	Total Units***
9.72 acres 87.5 du/acre	0	0	0	850	850

*Note: *The 9.72 acres accounts for the project site with proposed residential units.*

***10% (85 units) in the Specific Plan will be workforce housing, affordable to middle income households (175% of AMI).*

The 850 total residential units were approved as part of the Modelo Specific Plan by the Commerce City Council in February 2022.

City-Owned Properties

Vacant Sites in Existing Residential Zones

The City owns nine (9) vacant residential parcels in Commerce that have been identified for future housing opportunities. Five contiguous parcels, ranging in size from 0.11 acre to 1.08 acres, are located on Eastern Avenue and Triggs Street in the northern portion of the city adjacent to the 710 freeway. Due to the R2 zoning and associated maximum density of 17 dwelling units to the acre (du/ac), these parcels are calculated at 12 du/ac (70 percent of the maximum density). Since they are city-owned, the 17 potential units from these sites are applied to Commerce’s moderate income RHNA. These five parcels were classified as surplus land in December 2020. The City Council resolution also permitted the City to commence negotiations for the disposal of these properties.

The second group of contiguous vacant City-owned residential parcels are located on Gage Avenue near Zindell Avenue in the southern corner of Commerce. Currently zoned high density, these parcels total 0.90 acre. Calculated at 20 du/ac (maximum allowable density is 27 du/ac), these sites yield a potential of 12 units. Since these sites are City-owned, the units are allocated to Commerce's very low (6 units) and low (six units) income RHNA.

This Housing Element includes a program to adhere to the Surplus Land Act when disposing of these City-owned parcels.

Underutilized Sites in Proposed Mixed Use Rezone Areas

The City is currently updating its General Plan. In order to facilitate additional residential development, two new mixed use designations will be created and the current Atlantic Mixed Use category will be renamed Mixed Use Atlantic. The proposed land use densities for these mixed use designations ranges from 40 to 85 du/ac. All of the sites with these mixed use General Plan designations are located in the Commercial Manufacturing (C/M1) zone. Due to this designation, the sites will need to be rezoned in order to accommodate residential development.

A total of 16 City-owned parcels are included in this sites inventory that will be located in the proposed Mixed Use Atlantic and Mixed Use Washington 1 land use designations. These parcels are located along the Atlantic and Washington Boulevard corridors between the 5 and 710 freeways and range in size from 0.07 to 1.72 acres. As shown in Appendix C, these parcels can be consolidated to create three larger sites. Due to the proposed mixed use zoning, units on these sites were calculated at 50 du/ac for a total of 300 and are allocated as follows toward the RHNA: 73 very low, 70 low, 79 moderate and 78 above moderate income. The suitability of redeveloping these sites is discussed later in this chapter.

This Housing Element includes a program to adhere to the Surplus Land Act when disposing of these City-owned parcels.

Non-City-Owned Properties

Vacant Opportunity Sites in Existing Residential Zones

Four vacant parcels located near Duncan Avenue, Triggs Street and McBride Avenue are currently zoned for medium density residential and have a range of 0-17 du/acre. The five potential units on these parcels are calculated at 12 du/ac (70 percent of maximum) and can be used for above-moderate income housing units.

Underutilized Opportunity Sites in Proposed Mixed Use Rezone Areas

The Rosewood Village project demonstrates the trend of converting discontinued or obsolete commercial and industrial uses into residential development in Commerce. The Housing Opportunity Overlay (HOO) capitalizes on this trend to provide additional opportunities for affordable housing.

The City currently has one mixed-use General Plan designation: Atlantic Mixed Use. This designation will be changed to Mixed-Use Atlantic as part of the General Plan update and will include a higher density range (40 to 85 du/ac). The site inventory has ten parcels that are currently designated Atlantic Mixed Use in General Plan. All of the sites are currently zoned Commercial Manufacturing (C/M1) zone. Due to this designation, the sites will need to be rezoned in order to be consistent with its General Plan designation and to accommodate residential development. However, this rezoning is not needed to meet the City's RHNA for above moderate income households.

Appendix C shows that several of the ten parcels are under the same ownership and can be consolidated into four larger sites. Using a density of 50 du/ac (59 percent of maximum density), these parcels can provide 34 units, primarily affordable to above moderate income households.

Site Suitability

Suitability of Nonvacant Sites

The housing element must analyze the extent to which existing uses may impede additional residential development. The inclusion of nonvacant parcels in the sites inventory allow for mixed-use development along Commerce's corridors and allows for new residential uses to be geographically distributed throughout the city. All the nonvacant sites identified include parking lots (these must be identified as nonvacant by the California Department of Housing and Community Development), marginal uses such as underused commercial uses and marginal operations. Following is a brief description of the nonvacant sites:

City-Owned Nonvacant Sites

Of the 16 nonvacant sites that are owned by the City, 13 of them are parking lots. These parking lots can be combined and consolidated with the parcels described below.

The parcel located at 5555 Washington Boulevard has a Jack-in-the-Box fast food restaurant which was built in 1986 and is approximately 37 years old. The site also has a low FAR (0.13) and improvement to land ratio (0.449). This parcel can be consolidated with nine of adjoining parking lot parcels for a larger 2.2-acre site. Redevelopment of the

site does not necessarily require the removal of this use but can be incorporated into the overall redevelopment.

A parcel at 5733 Sheila Blvd and an adjoining parking lot parcel mentioned above currently have an operational commercial transportation company. The building was built in 1968, making it over 50 years old and has a low FARs (0.099). These two parcels can be consolidated and make a 2.61-acre site.

The City's corporation and maintenance yard is currently located at 5611 Washington Boulevard and three adjoining parking lot/storage parcels. The building was constructed in 1966, making it more than 55 years old. The City is currently in the process of relocating the Corporation yard and maintenance facilities.

The City reviewed all city-owned properties and identified these for residential development. As mentioned earlier, a program has been included in this Housing Element to pursue redevelopment of these sites.

Non-City-Owned Nonvacant Sites

Similar to the City-owned nonvacant sites, the underutilized opportunity sites are mainly parking lots. Of the 11 parcels, only one has a structure built on the site. This is a storage/office building located at 2210 Atlantic Boulevard. The structure was built in 1953, has a low FAR of 0.08 and an improvement to land ratio of 0.52. Furthermore, none of these parcels are identified for lower income use and are not needed to meet the City's RHNA.

Small Lot Development

While the non-city-owned sites can be consolidated due to parcel location and same ownership, the proposed sites will still be under ½ acre in size. Due to this size limitation, the proposed units on these sites are designated for above-moderate income and are not being used to meet the City's RHNA allocation.

Summary of RHNA Strategies

Overall, the City is able to accommodate its RHNA, with a 52 percent buffer for the remaining very low income RHNA, a 407 percent buffer for the remaining low income RHNA and a 153 percent buffer for the remaining moderate income RHNA (Table 4-4). Figure 4-2 shows the City's site inventory by income category.

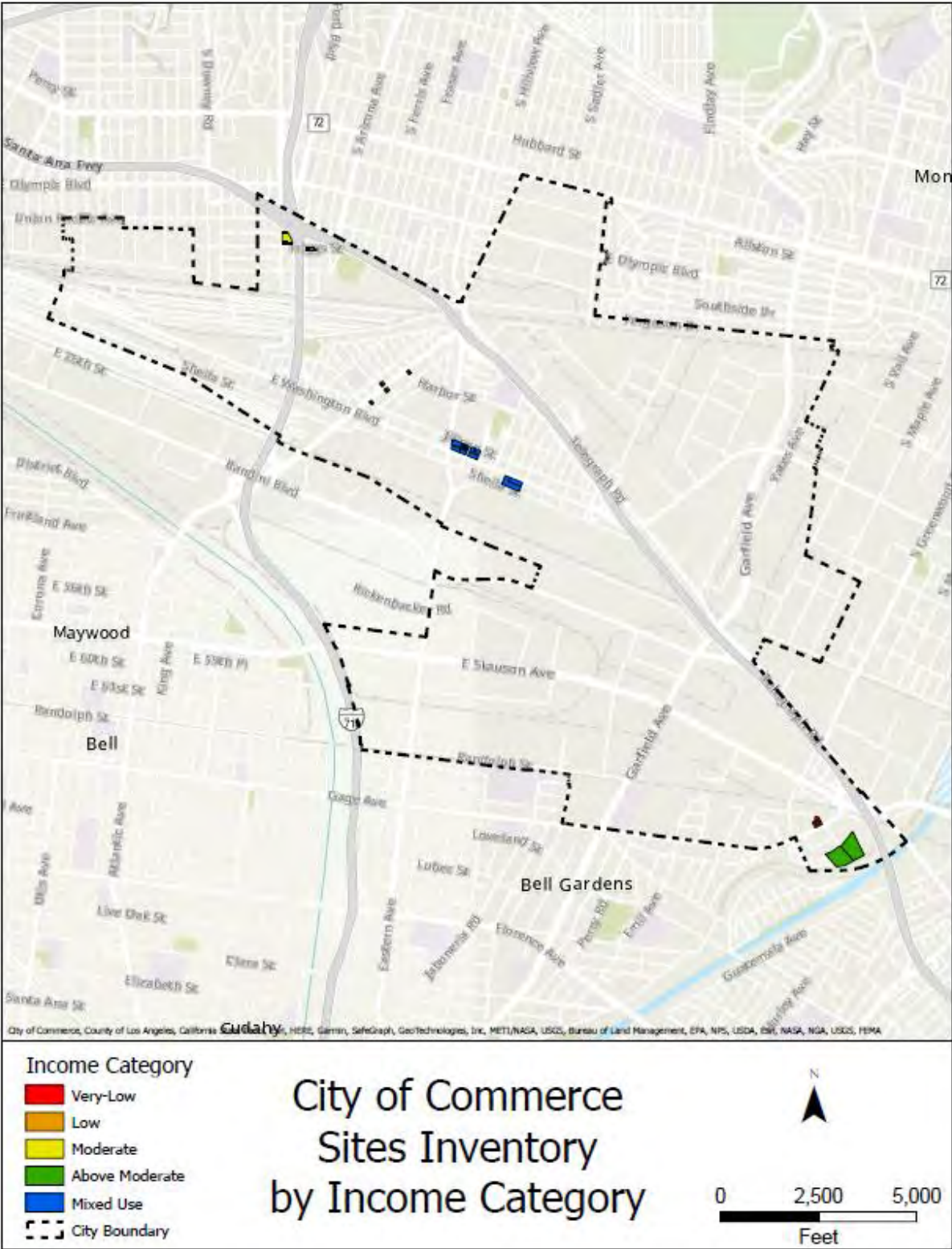
Table 4-4: Summary of RHNA Strategies

	Extremely Low/Very Low	Low	Moderate	Above Moderate	Total
RHNA	55	22	39	131	247
Potential ADUs*	3	7	1	5	16
Building Permits Issued (Site 1B of Rosewood Village)	0	0	0	31	31
Entitled (Site 1A and Site 2)	0	0	0	102	102
Total Credits	3	7	1	138	149
Remaining RHNA Need	52	15	38	0	105
Modelo Specific Plan	0	0	0	850	850
City-Owned Properties					
Vacant Residential Sites	6	6	17	0	29
Underutilized Mixed Use Rezone Sites	73	70	79	78	300
Non-City-Owned Properties					
Vacant Residential Opportunity Sites	0	0	0	5	5
Underutilized Opportunity Mixed Use Rezone Sites	0	0	0	34	34
Total Units to Meet Remaining RHNA Need	79	76	96	967	1,218
Surplus	27	61	58	967	1,113
% Buffer over Remaining Lower Income RHNA	52%	407%	153%	N/A	

Note: *ADUs distributed according to the SCAG region recommended income distribution

****Lower income units distributed proportionately between very low and low income based on RHNA allocation**

Figure 4-2: Commerce Site Inventory By Income Category



Availability of Infrastructure and Services

As a completely urbanized community, the City of Commerce has already in place all of the necessary infrastructure to support future development. All land designated for residential use is served by sewer and water lines, streets, storm drains, and telephone, electrical, and gas lines. However, improvements and expansions may be necessary to accommodate the intensification of land use. The Modelo Specific Plan and EIR addresses the infrastructure needed for the residential development in the plan area.

SB 1087, effective January 2006, requires water and sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower income households. Pursuant to these statutes, upon adoption of its Housing Element, Commerce will immediately deliver the Element to local water and sewer providers, along with a summary of its regional housing needs allocation.

Financial Resources

There are a variety of potential funding sources available for housing activities in Commerce. Due to both the high cost of developing and preserving housing, and limitations on both the amount and uses of funds, a variety of funding sources may be required. Table 4-5 lists the potential funding sources that are available for housing activities. They are divided into five categories including: Federal, State, county, local and private resources.

Table 4-5: Financial Resources Available for Housing Activities

Program Name	Description	Eligible Activities
1. Federal Programs and Funding Sources		
Community Development Block Grant (CDBG) (Administered by LACDA)	The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. The City receives CDBG funds from the County of Los Angeles.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Home Investment Partnership (HOME) (Administered by LACDA)	Commerce or nonprofits proposing to development affordable housing can apply to receive HOME funds through the County of Los Angeles. HOME funds are used to assist low income (80% AMI) households.	New Construction Acquisition Rehabilitation Homebuyer Assistance Rental Assistance

Program Name	Description	Eligible Activities
Mortgage Credit Certificate	Federal income tax credits (15% mortgage interest) available to low income first-time homebuyers to purchase housing in Commerce. The County makes certificates available through participating lenders.	Home Buyer Assistance
2. State Programs		
Low-income Housing Tax Credit (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sale are typically used to create housing. Tax credits are available between 4% and 9%.	New Construction
SB 2/LEAP Grants	SB 2 funds are available as planning grants to local jurisdictions to increase the supply of affordable housing. For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG).	Planning
CalHome www.hcd.ca.gov/fa/calhome	Grants to cities and non-profit developers to offer homebuyer assistance, including down payment assistance, rehabilitation, acquisition/rehabilitation, and homebuyer counseling. Loans to developers for property acquisition, site development, predevelopment and construction period expenses for homeownership projects	Predevelopment Site development Site acquisition Rehabilitation Acquisition/Rehab Down payment assistance Mortgage financing Homebuyer counseling
Multi-Family Housing Program (MHP)	Deferred payment loans to local governments, non-profit and for-profit developers for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower income households.	New Construction Rehabilitation Preservation Conversion of Nonresidential to Rental
Transit-Oriented Development Housing Program	Under the program, low-interest loans are available as gap financing for rental housing developments that include affordable units, and as mortgage assistance for homeownership developments. In addition, grants are available to cities, counties, and transit agencies for infrastructure improvements necessary for the development of specified housing developments, or to facilitate connections between these developments and the transit station.	Homebuyer Assistance Predevelopment Site development Infrastructure

Program Name	Description	Eligible Activities
CalHFA Homebuyer's Down payment Assistance Program	CalHFA makes below market loans to first-time homebuyers of up to 3% of sales price. Program operates through participating lenders who originate loans for CalHFA. Funds available upon request to qualified borrowers.	Homebuyer Assistance
Golden State Acquisition Fund (GSAF)	Affordable Housing Innovation Program (AHIP): provides loans for developers through a nonprofit fund manager to provide quick acquisition financing for the development or preservation of affordable housing.	New Construction Acquisition Rehabilitation Preservation
Infill Infrastructure Grant Program (IIG)	Provides grants for infrastructure construction and rehabilitation to support higher-density affordable and mixed-income housing in infill locations.	Predevelopment Site development Infrastructure
Multifamily Housing Program	Provides funding for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9% federal low income housing tax credits. Eligible costs include the cost of child care, after-school care and social service facilities integrally linked to the assisted housing units; real property acquisition; refinancing to retain affordable rents; necessary onsite and offsite improvements; reasonable fees and consulting costs; and capitalized reserves.	Acquisition Rental Assistance Public Services Site development Infrastructure Development Fees
Predevelopment Loan Program (PDLP)	Provides predevelopment capital to finance the start of low income housing projects.	Predevelopment
3. County Programs		
Housing Choice Vouchers (formerly Section 8)	Rental assistance payments to owners of private market rate units on behalf of low-income (50% MFI) tenants.	Rental Assistance
Los Angeles County Housing Innovation Fund	LACHIF provides low-cost financing up to \$5,000,000 to support the creation and preservation of affordable housing, including supportive housing projects. Eligible entities include non-profit and for-profit developers, and cities in Los Angeles County.	Predevelopment Acquisition

Administrative Resources

Described below are several non-profit agencies that are currently active and have completed projects in Los Angeles County. These agencies serve as resources in meeting the housing needs of the City, and are integral in implementing activities for acquisition/rehabilitation, preservation of assisted housing, and development of affordable housing. The City currently has a program within their Housing Plan to partner with affordable housing developers, including the three mentioned below.

National CORE

National CORE is one of the most active affordable housing developers in California, especially in southern California. It has developed over 120 affordable housing projects nationwide. It has experience developing housing that caters to the diverse needs of seniors, special needs, and workforce, and a range of housing types such as multi-family, Project Homekey, mixed use, and intergenerational housing.

Habitat for Humanity

Habitat is a non-profit, Christian organization that builds and repairs homes for sale to very low-income families with the help of volunteers and homeowner/partner families. Habitat homes are sold to partner families at no profit with affordable, no interest loans. The local affiliate, Habitat for Humanity, has been active in the region, rehabilitating or building new homes for families annually.

Jamboree Housing Corporation (JHC)

JHC is a non-profit developer that has developed and implemented numerous affordable housing projects throughout Southern California and the State. Jamboree has also established an in-house social services division to assist residents in maintaining self-sufficiency. "Housing with a HEART" (Helping Educate, Activate and Respond Together) now operates at most Jamboree-owned properties.

Mercy Housing California

Mercy Housing has offices in Los Angeles, San Francisco, and Sacramento. Mercy Housing serves more than 10,000 people at about 100 properties. Residents range from families to people with special needs to seniors.

Opportunities for Energy Conservation

Energy Efficiency Programs

While the City does not directly offer energy-efficient programs, it serves as an information center for the various programs available for area residents. Below is a list of energy efficiency programs offered by various organizations:

Southern California Edison (SCE)

The following two programs are offered by SCE to help lower income customers reduce energy costs and control their energy use:

California Alternate Rates for Energy (CARE) /Family Electric Rate Assistance (FERA): These programs provide income-qualified customers with much-needed bill relief.

Arrearage Management Plan (AMP) Program: This program is a debt forgiveness payment plan option for residential CARE and FERA customers who have past due bills totaling \$500 or greater which are at least 90 days old. In exchange for making on-time payment of your current monthly bill, AMP will forgive 1/12 of the eligible total past due amount.

Energy Savings Assistance Program: This program is designed to assist income-qualified households with the conserving of energy and reducing their monthly electrical costs. SCE may provide free appliances and installation of energy-efficient appliances like refrigerators and air conditioners, as well as home efficiency solutions like weatherization.

Energy Assistance Fund (EAF) Program: SCE and United Way work together to assist customers who are unable to pay their electric bill due to a financial constraint. A maximum of \$100 is available to eligible customers once in a 12-month period. The program has provided assistance for nearly 250,000 households since the fund started in 1982.

Medical Baseline Allowance: Customers with a medical condition that requires electricity- powered life support equipment may be eligible to receive additional baseline allocation. The Baseline program offers an additional year-round baseline allocation of 16.5 kWh per day in addition to a customer's applicable seasonal baseline and the baseline for its region.

Southern California Gas Company

The following programs are available to SoCalGas customers who reside in the City of Commerce:

California Alternate Rates for Energy (CARE): The CARE program provides eligible SoCalGas customers a 20 percent discount on their monthly gas bill. In addition, new customers who are approved within 90 days of starting new gas service will also receive a \$15 discount on the Service Establishment Charge.

Energy Savings Assistance Program: SoCalGas offers no-cost energy-saving home improvements and furnace repair or replacement services for qualified limited-income renters and homeowners. Available energy-saving services may include attic insulation, door weather-stripping, caulking, low flow shower heads and faucet aerators, water heater blankets, and energy education.

Medical Baseline Allowance: SoCalGas knows that not all customers are alike. Some of them suffer from poor health, which can make it even harder to make ends meet. If someone in the household has a life-threatening illness, is seriously disabled, or requires more heat in winter due to a serious health condition, the household may qualify for an additional allowance of gas at a lower rate.

Residential Energy Efficiency Loan (REEL): The REEL program offers a variety of financing options to owners and renters to purchase energy-efficiency products and upgrades. Eligible properties include single family homes, condominiums, townhomes, and 1-4 unit properties. Property owners are eligible for this program, as are renters who receive approval from their property owner.

Building and Site Design Conservation

Many modern design methods used to reduce residential energy consumption are based on proven techniques. These methods can be categorized in three ways:

1. Building design that keeps natural heat in during the winter and out in the summer. Designs aim to reduce air conditioning and heating demands. Proven building techniques in this category include:
 - a. Orienting windows and openings of a building to follow the path of the sun, in order to minimize solar gain in the summer and maximize solar gain in the winter;
 - b. Utilizing “thermal mass,” earthen materials such as stone, brick, concrete, and tiles that absorb heat during the day and release heat at night;
 - c. “Burying” sections of the structure in a hillside or berm to insulate the home against extremes of temperature;
 - d. Application of window coverings, insulation, and other materials to reduce heat exchange between the interior and the exterior of the home;
 - e. Strategic placement of openings and the use of ventilating devices that take advantage of natural air flow (particularly cool evening breezes); and

- f. Designing eaves and overhangs above windows to block direct summer solar gain during the summer, but allow for solar gain during the winter.
- 2. Building orientation that allows natural elements to maintain a comfortable interior temperature. Examples include:
 - a. Orienting the long axis of a building in a north-south position;
 - b. Minimizing the southern and western exposure of exterior surfaces; and
 - c. Designing the structure to admit the maximum amount of sunlight into the building and to reduce exposure to extreme weather conditions;
 - d. Positioning dwelling units to take advantage of natural air circulation and evening breezes.
- 3. Use of landscaping features to moderate interior temperatures. Such techniques include:
 - a. Planting of deciduous shade trees and other plants to protect the home;
 - b. Design including natural or artificial flowing water; and
 - c. Strategic placement of trees and hedges to control air flow.

CHAPTER 5: HOUSING PLAN

Summary of Housing Issues

Virtually all of the land area within Commerce's corporate boundaries was developed prior to the City's incorporation in 1960. Over the years, the lack of available land has presented unique challenges to the City's efforts to provide housing for its residents. Key issues related to housing that are the focus of this Housing Element are described below.

- Nearly 99 percent of the City of Commerce's residents live in the eleven well-defined neighborhoods that are scattered throughout the City. Most housing units in these neighborhoods were constructed before 1960, although in general the housing stock is in good condition.
- The City's distinct neighborhoods are surrounded by industrial and commercial uses leaving them impacted by the related truck traffic, freeway noise, air quality issues, and environmental justice concerns. New residential development must be strategically located and the proper environmental analyzes completed before construction occurs.
- The average household size decreased between 2010 and 2020 from 3.89 persons to 3.61 persons due to an aging population. Median age in the City increased from 28.1 to 37.5 during the same period.
- A significant number of households in Commerce are overcrowded, and the garages of some homes have been illegally converted into living quarters. Overcrowding rate was reported at 16 percent in 2020 compared to 11 percent countywide.
- While housing costs in Commerce are relatively low in comparison to the region, 39 percent of the households in the City experienced housing cost burden due to the lower incomes of Commerce households.
- In 2021, the City's housing inventory included 3,524 housing units. Of this total, 78 percent are classified as single-family, 7 percent are in structures containing between 2 to 4 units, and 15 percent are located in multiple-family developments containing five or more units.

Goals and Policies

For the City of Commerce the enduring objective is to facilitate and encourage housing that fulfills the diverse needs of the community. To achieve this goal the Housing Plan identifies long-term housing goals and shorter-term policies to address the identified housing needs. The goals and policies are then implemented through a series of housing programs. Programs identify specific actions the City plans to undertake toward achieving each goal and policy.

The goals, policies, and programs within the Housing Plan build upon the identified housing needs in the community, constraints confronting the City, and resources available to address the housing needs. This Plan will guide City housing policy through the 2021-2029 planning period. Commerce's housing goals, policies, and programs address the following five major areas:

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

Goal 1: Identify Adequate Sites to Achieve Housing Variety.

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

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

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

Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.

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

housing to meet the needs of the community, including the needs of both renter- and owner-households.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy 4.5: Design new higher-density residential projects at a scale (number of units, height, etc.) that is compatible in design with adjacent residential areas.

Policy 4.6: Cooperate with non-profit housing providers in the acquisition, rehabilitation, and maintenance of older apartment complexes, single-family houses and hotel/motels to be preserved as long-term affordable housing.

Policy 4.7: Monitor affordable housing developments, accessory dwelling units, and vacant units within the City, and work to preserve existing affordable housing that is considered at risk of converting to market-level rents.

Goal 5: Affirmatively further fair housing.

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

Policy 5.1: Comply with federal, state, and local Fair Housing and anti-discrimination laws, and affirmatively further fair housing for all, ensuring equal access to housing regardless of their special circumstances as protected by fair housing laws.

Policy 5.2: Promote housing mobility by expanding housing choices and increasing housing opportunities in higher resource areas.

Policy 5.3: Protect tenants from discriminatory housing practices and displacement.

Policy 5.4: Promote the integration of affordable and special needs housing projects in existing neighborhoods.

Policy 5.5: Collaborate with and support efforts of organizations dedicated to eliminating housing discrimination.

Implementation Programs, Actions, and Objectives

Goal 1: Identify Adequate Sites to Achieve Housing Variety.

Program 1.1 – Adequate Sites for RHNA and Monitoring of No Net Loss

For the 2021-2029 planning period, the City of Commerce has an assigned RHNA allocation of 247 units (55 very low income, 22 low income, 39 moderate income, and 131 above moderate income units). As of May 2023, the City had issued permits for 31 new units and approved entitlement for 102 units during this planning period. Along with 16 projected ADUs, the City has met all its RHNA for above moderate income units and a portion of it lower and moderate income units. The remaining RHNA is 105 units (52 very low income, 15 low income, and 38 moderate income units) that the City must identify adequate sites to allow for future development.

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

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

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

Timeline and Objectives:

- Complete redesignation of City-owned nonvacant sites for residential mixed use development, adequate to accommodate the remaining 76 units through General Plan Update by the end of 2023. Complete rezoning of City-owned nonvacant sites by the end of 2024 as part of the comprehensive update to the Zoning Code. As part of the rezoning, establish a procedure to provide by-right approval of projects on reuse sites (identified in the previous Housing Elements) and rezone sites that include 20 percent of the units as housing affordable to lower income households.
- Maintain an inventory of the available sites for residential development and make it available on City website. Update sites inventory annually.
- Comply with SB 166 (No Net Loss) by monitoring the consumption of residential and mixed use acreage to ensure an adequate inventory is available to meet the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 by the end of 2024. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA. Monitoring will be conducted annually to ensure the City maintains an adequate buffer for the remaining RHNA. If the buffer is diminishing, the City will undertake a proactive and coordinated approach to replenish the sites inventory
- By July 2025, issue Requests for Proposal to solicit affordable housing development on the City-owned sites identified in the Sites Inventory.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 1.2 – Replacement Housing

Development on nonvacant sites with existing residential units is subject to replacement requirement, pursuant to AB 1397. Specifically, AB 1397 requires the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law.

Timeline and Objectives:

- By the end of 2024, update the Zoning Code to address the replacement requirements.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 1.3 – Accessory Dwelling Units

The City will facilitate the development of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs). The City last updated its ADU standards in August 2020 (Ordinance No. 761) to comply with California Government Code Sections 65852.2 and 65852.22. The existing ordinance complies with State requirements pertaining to unit size, location, and number of units permitted, parking, and other provisions. However, since 2020, the State legislature has passed additional bills related to ADUs. In order to help facilitate the development of ADUs, the City will amend the Zoning Code to comply with State law and provide information about ADUs and the approval process on the City website.

Timeline and Objectives:

- Facilitate construction of 16 ADUs within the planning period.
- By the end of 2023, update City website to provide a link to California Housing Finance Agency (CalHFA) ADU Grant Program.
- By the end of 2024, update the Zoning Code to comply with State requirements for ADUs, including AB 2221 and SB 897.
- By the end of 2024, develop an information sheet/brochure on ADUs, including building requirements and the permitting process, that may be given to interested property owners and kept at the Planning/Community Development Department. This information should also be included on the City website.
- By the end of 2024, develop and include a Fair Housing Factsheet, especially on Source of Income protection (i.e., use of public subsidies such as Housing Choice Vouchers for housing payments) in the ADU application packet.
- By the end of 2024, develop incentives to encourage development of ADUs, including financial assistance (from state programs if available) to assist lower income homeowners with construction, among others.

Responsible Agency: Planning Division

Program 1.4 – Extremely Low-Income and Special Needs Housing

To assist in the development of housing to meet the needs of extremely low, very low and low income households, the City offers fast track processing, development fee modifications, density bonus incentives, reductions in development and parking standards, and funding for off-site improvements. The City prioritizes funding opportunities to ensure that extremely low and very low income housing are given precedence and are able to easily access the financial and regulatory incentives offered by the City.

Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, establish incentives and appropriate development standards that can be implemented to encourage development of housing for lower income households.
- During the planning period, utilize City-owned sites to meet the housing needs of lower income households.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 1.5 – Alternative Housing Models

The City recognizes the changing housing needs of its population, including aging seniors in need of supportive services. To meet such needs, the City can encourage, through development incentives, the provision of more innovative housing types that may be suitable for the community, including community care facilities, supportive housing, and assisted living for seniors. Assisted living facilities are designed for elderly individuals needing assistance with activities of daily living but desiring to live as independently as possible for as long as possible. Such facilities bridge the gap between independent living and nursing homes, and offer residents help with daily activities such as eating bathing, dressing, laundry, housekeeping, and assistance with medications. Assisted living can help to meet the housing and supportive services needs of Commerce's relatively large and growing senior population. Other alternative housing models such as micro units, live/work units, and co-housing will also be considered.

Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, establish incentives and appropriate development standards that can be implemented to encourage development of alternative housing models.

Responsible Agency: Planning Division

Funding Source: General Fund

Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.

Program 2.1 – First Time Homebuyer 2.0 Program

The First Time Homebuyer 2.0 Program has been used to provide income-qualified (up to 175 percent AMI) Commerce residents secondary financing of up to \$150,000 to assist with down payment and closing costs related to purchasing a new home within the Rosewood Village housing development. Up to nine (9) qualified and eligible participants were chosen through a lottery process during 2022. The City will continue to offer homebuyer assistance through partnership with developers. The Modelo project also provides 85 units as workforce housing (up to 175 percent AMI).

Lower income residents in Commerce are also eligible to apply for first-time homebuyer assistance administered by the Los Angeles County Development Authority (LACDA). The Home Ownership Program (HOP) provides a second mortgage loan for first-time homebuyers with an assistance amount of up to \$85,000, or 20 percent of the purchase prices, whichever is less. The loan provides down payment and/or closing assistance and is secured with a Deed of Trust and Promissory Note. The HOP offers zero percent interest loans with a deferred payment. Repayment is required when the home is sold, there is a transfer of title, or the home is no longer owner-occupied. To qualify, a homebuyer must not have owned a home in the last three years and the home must be owner-occupied.

Timeline and Objectives:

- By the end of 2023, update City website to provide a link to California Housing Finance Agency (CalHFA) homebuyer assistance programs, as well as to HOP offered by LACDA.
- Provide first-time homebuyer assistance to 85 households through development of the Modelo Specific Plan through 2029.
- Partner with the City's Library Social Services Division to have information about the First Time Homebuyer 2.0 program available at the library and community centers.
- Beginning in 2024 and annually thereafter, pursue funding from State and federal programs to provide homebuyer assistance to lower and moderate income households.

Responsible Agency: Planning Division

Funding Source: Development Agreement

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

Program 3.1 - Atlantic Blvd. and Washington Blvd Mixed-Use Areas

In the 2020 General Plan, a Mixed-Use designation along the Atlantic Boulevard corridor between the Mixmaster (on the north) and Washington Boulevard (on the south) was created. This land use designation provides for both residential development and commercial development. The City is in the process of updating the General Plan, with adoption anticipated by the end of 2023. In addition to the current Atlantic Mixed-Use designation (which will be renamed Mixed-Use/Atlantic), the General Plan Update will include two other residential mixed use categories: Mixed-Use and Mixed-Use/Washington 1. The Mixed-Use land use designation will have a density of 40-60 dwelling units per acre while the Mixed-Use Atlantic and Mixed-Use Washington 1 designations will have densities of 40-85 dwelling units per acre. The General Plan update will include design guidelines for these mixed-use areas.

Timeline and Objectives:

- By the end of 2023 as part of the General Plan update, develop objective design standards for the City's mixed-use land use areas.
- Annually, contact developers in the area to inform them of potential opportunity sites, the established development standards, and other pertinent information.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 3.2 – Zoning Ordinance Amendments

Once the General Plan Update is completed, a comprehensive Zoning Ordinance update will be conducted to ensure consistency and compliance with various State laws, as well as potential constraints to development. The Zoning Ordinance update will include:

- **Residential Development Standards:** Establish appropriate development standards to facilitate the achievement of maximum allowable density in the respective residential and mixed use zones. These include parking, height, setbacks, and lot coverage requirements.

- **Emergency Shelters and Low-Barrier Navigation Centers:** Designating emergency shelters as a permitted use in the M-1 zone no longer conforms with State law (AB 2339), the City will designate emergency shelters by right in the new Mixed Use or Mixed Use/Atlantic designations where multi-family, mixed use, and live/work housing, among other housing types are permitted. Updates to the Zoning Ordinance must also be made to comply with AB 139 (permit by-right shelters, parking and distance requirements) and AB 101 (Low Barrier Navigation Centers).
- **Multi-Family Parking Requirement:** Currently, the Zoning Ordinance requires one garage space per unit plus $\frac{1}{2}$ guest space for efficiency/one-bedroom units and two garage spaces and $\frac{1}{2}$ guest space per unit for two or more bedrooms. These standards may be a constraint to multi-family development. During the Zoning Ordinance update process, establish appropriate parking standards to facilitate multi-family housing and mixed use development. Other parking incentives such as shared parking and tandem parking will be considered.
- **Transitional and Supportive Housing in C-2 Zone:** Currently, transitional and supportive housing are not permitted in the C-2 zone where residential uses are permitted. Amend the Zoning Ordinance to permit transitional and supportive housing in the C-2 zone (or equivalent nonresidential zones that permit housing and mixed use zones to implement the updated General Plan).
- **Employee Housing:** No areas in the City are designated or permit commercial farming activities. Amend the Zoning Ordinance to comply with the State Employee Housing Act, which requires employee housing for six or fewer employees to be treated as a single-family structure to be permitted in the same manner as similar uses in the same zone.
- **Large Residential Care Facilities (Seven or More):** Amend the Zoning Ordinance to conditionally permit large community care facilities in zones where residential uses are permitted.
- **Reasonable Accommodation:** Currently, the Zoning Ordinance's required finding relating to adverse impact on surrounding properties or uses can be considered subjective and constraining to the development or improvement of housing for persons with disabilities. During the comprehensive Zoning Ordinance update, remove this subjective finding.
- **Accessory Dwelling Units:** Recent bills (AB 2221 and SB 897) passed in October 2022 provide additional clarifications to the Government Code regarding ADU regulations. The Zoning Ordinance will be amended to comply with State law.

- **Density Bonus:** The City's Density Bonus ordinance was last updated in 2013. Amend the Zoning Ordinance to comply with State law.
- **SB 35:** The City will establish a standard procedure for processing SB 35 eligible projects, pursuant to State law.

Timeline and Objectives:

- By the end of 2024, comprehensively update the Zoning Ordinance, including specific revisions as outlined in this program in compliance with State law and to remove barriers and constraints to housing development.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 3.3 - Lot Consolidation Program

Parcels located in specific areas of the City along Atlantic Boulevard and Washington Boulevard tend to be narrow and shallow in size, which can act as a constraint to the development of larger housing projects. To encourage the development of higher density residential and mixed-use projects on vacant and underutilized sites, the City offers incentives to encourage lot consolidation, including but not limited to: development standard modifications (i.e. lot size, parking, and open space requirements), streamlined processing, and assistance with development fees, when funding is available.

Timeline and Objectives:

- By the end of 2024, as part of the Zoning Ordinance update, establish additional incentives for lot consolidation.
- Notify housing developers of development incentives and opportunities for lot consolidation.
- Using the 6th Cycle Housing Element's sites inventory, consolidate City-owned parcels to create six developable sites.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 3.4 - Streamlined Processing

The City continues to monitor permit processing times to ensure the fastest possible turnaround for applications and identify any impediments to affordable housing. Additionally, the processing of applications for new construction or rehabilitation of

housing for lower and moderate-income households and seniors will be prioritized. To comply with SB 9, the City will facilitate ministerial approvals for lot splits in the R-1 zone.

Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, facilitate ministerial approvals for lot splits in the R-1 zone.
- Continue to monitor permit processing times and investigate ways to streamline the process. Prioritize the review of projects that include affordable housing units.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 3.5 – Incentives for Affordable Units for Large Households and Multigenerational Households

The City recognizes that housing priorities shift over time as housing needs change. The characteristics of the City's current housing need have been identified through the Needs Assessment, specifically the analysis of the special needs groups. Based on the needs analysis completed for this Housing Element, there is a need to provide both affordable rental and homeownership units for large families. In addition, the concept of multigenerational family housing is an important option to be considered. The City is actively pursuing affordable homeownership for its workforce through development agreements, including for the Modelo Specific Plan and the Rosewood Village projects. The City will be pursuing other affordable housing opportunities using City-owned properties.

During the comprehensive Zoning Ordinance update, the City will establish incentives and/or regulations to promote the development of rental and ownership housing with three or more bedrooms. As part of the Modelo Specific Plan, the City has included flexible development standards to encourage and facilitate an increased number of larger units.

Timeline and Objectives:

- By the end of 2024, as part of the comprehensive Zoning Ordinance update, establish additional incentives and/or development regulations to promote the development of rental and ownership housing with three or more bedrooms.
- To increase the number of affordable multi-bedroom units to accommodate large low income households, pursue affordable housing for larger and multigenerational households using City-owned properties.

- Explore options for larger units with interested developers and property owners.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 3.6– Off Site Improvements

On a case-by-case basis, the City will provide opportunities for public, private and non-profit groups to develop affordable housing by constructing off-site improvements and physical infrastructure as Capital Improvement Projects. Assistance provided by the City may include traffic, street and sewer upgrades as well as other pedestrian and mobility improvements. The City will work directly with developers, on a case-by-case basis, to determine the feasibility of providing assistance.

Timeline and Objectives:

- Facilitate the development of affordable housing by allowing improvements to be negotiated.

Responsible Agency: Planning Division

Funding Source: General Fund

Program 3.7 – Water and Sewer Service Providers

In accordance with Government Code Section 65589.7, immediately following City Council adoption of the Housing Element, the City will deliver a copy of the 2021-2029 Housing Element to all public agencies or private entities that provide water or sewer services to properties within the City of Commerce.

Timeline and Objectives:

- Ensure that water and sewer providers are aware of the City's intentions for residential development by providing copies of the 2021-2029 Housing Element upon adoption of the Housing Element by December 2023.

Responsible Agency: Planning Division

Funding Source: General Fund

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

Program 4.1 - Code Enforcement

The objective of the City's Code Enforcement Program is to bring substandard units into compliance with City codes. Potential code violations are identified based on exterior windshield surveys and complaints reported to the City. The City's code enforcement officers work closely with Housing Division and Planning Division staff, as well as property owners, to identify units in need of housing assistance. To address the continuing problem of illegal units and garage conversions, code enforcement officers survey the City to identify such units. They then notify the property owner that they are in violation of City law, and enforce the necessary actions required to bring properties into compliance with City Codes. These efforts are intended to improve the condition of housing units and maintain neighborhood character throughout the City.

When appropriate, code enforcement officers provide property owners notice of any rehabilitation assistance for which they may be eligible to assist in correcting code violations. Eligible residents are typically referred to Neighborhood Fix-Up Grant, and the CDBG Home Preservation Grant Program. As described in the Needs Assessment, Code Enforcement conducted a windshield survey of the residential areas of the city and estimated that there are approximately 180 to 200 housing units in need of rehabilitation or replacement.

Timeline and Objectives:

- Every two years during the planning period, conduct window surveys to determine housing units that are in need of rehabilitation and repairs. Information about the Neighborhood Fix-Up Grant and CDBG Home Preservation Grant Programs shall be provided to the property owners.

Responsible Agency: Code Enforcement Division

Funding Source: General Fund

Program 4.2 - Neighborhood Fix Up Grant Program

The Commerce Community Development Commission established the Neighborhood Fix-Up Grant Program to provide financial assistance to City of Commerce residents for the improvement of their homes. The Neighborhood Fix-Up Grant Program reimburses residents with grant funds up to \$1,000 for the materials purchased to complete upgrades to the exterior portion of their home that is visible from the street. Over the years, the Neighborhood Fix-Up Grant Program has proven to be successful in revitalizing residential areas in the City. Between 2014 and 2021, approximately 98

homes were assisted through the Neighborhood Fix-Up Program. The funding for this program is through Measure A. Information about the program will be added to the City website and provided at City Hall and other public locations to reach as many households as possible.

Timeline and Objectives:

- During the planning period, assist 100 households with Neighborhood Fix-Up Program
- Create informational brochures about the Neighborhood Fix-Up Program to have available at City Hall, other public locations and on the City website.

Responsible Agency: Planning Division, Housing Division and Code Enforcement Divisions

Funding Source: Measure A

Program 4.3 – CDBG Home Preservation Grant Program

The City of Commerce as a subgrantee of the Los Angeles Community Development Authority (LACDA) Federal Community Development Block Grant (CDBG) funds, has implemented the Home Preservation Grant Program. This program was established to address substandard housing conditions and to promote property maintenance by providing residential rehabilitation grants to qualified low- and moderate-income residents living in single-family owner-occupied dwellings. The Housing Division administers the program and provides funds, up to \$20,000, to qualified applicants to complete improvements to their residence. Between 2014 and 2021, a total of \$1,083,507 was allocated to the Home Preservation Grant Program. The City assisted between 3 to 6 households annually. The City website includes information on the grant program's guidelines as well as an interest form for residents to fill out and submit to the Economic Development and Planning Department

Timeline and Objectives:

- During the planning period, assist 40 households (average of five households annually) with the Home Preservation Grant Program.

Responsible Agency: Planning, Housing, and Code Enforcement Divisions

Funding Source: CDBG funds

Program 4.4 - Monitor and Preserve Affordable Housing

There are currently three federally assisted multi-family rental complexes in Commerce with affordability covenants including: 55 units at the Rosewood Park Senior Apartments, 24 units at TELACU Gardens and 76 units at TELACU Manor. Commerce's assisted units are all at risk based on the expiration of restrictions for low income use through various financing sources or expiration of Section 8 rental assistance, contracts. However, while the units described in Table 2-30 may meet the definition of at risk of conversion as described in Government Code Section 65583, the risk of conversion for two of these complexes is low because they are owned by The East Los Angeles Community Union (TELACU), whose mission as a nonprofit organization is to provide affordable housing for seniors. The Needs Assessment looked at preservation and replacement options for the at-risk units, including transfer of ownership, replacement and rental assistance. In the unlikely event that the City receives notice of a potential conversion of the federally assisted units, the Housing Division will contact the owners to pursue preservation of these units as affordable housing.

All dwelling units that receive public assistance in the City (including rehabilitation assistance and land write-down projects) shall continue to have affordable housing agreements filed with the land to ensure the long-term affordability of the units. At such time that a housing unit's affordability covenant nears expiration and the owner wishes to sell the unit at (market rate), the City will work with the seller to ensure that the affordability status is maintained.

Timeline and Objectives:

- When the City receives notice of a potential conversion of the federally assisted units, contact the property owners to pursue options to preserve these units as affordable housing. Ensure the owners comply with the State notification requirements to notify their tenants three years, one year, and six months in advance of conversion.
- In the event of potential conversion, pursue funding available at State and federal levels to preserve the affordable units.
- Throughout the planning period, all dwelling units that receive public assistance in the City (including rehabilitation assistance and land write-down projects) shall continue to have affordable housing agreements filed with the land to ensure the long-term affordability of the units.

Responsible Agency: Housing Division

Funding Source: General Fund; State and federal funds

Goal 5: Affirmatively further fair housing.

Program 5.1 – Affirmatively Furthering Fair Housing

The City is committed to affirmatively further fair housing in the community. Actions to foster equal housing opportunities are centered on several theme:

- Collaborate with and support efforts of organizations dedicated to eliminating housing discrimination in Commerce.
- Facilitate the development of a variety of housing types to foster housing mobility.
- Pursue actions and policies that mitigate economic displacement of residents.
- Distribute new affordable housing opportunities throughout the City to avoid overconcentration low income housing in specific neighborhoods.
- Employ place-based strategies for neighborhood improvements.

The City's actions to further fair housing are summarized in Table 5-1.

Table 5-1: Affirmatively Furthering Fair Housing Matrix

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
Fair Housing Outreach and Enforcement				
AFFH Outreach Actions	Coordinate with the Housing Rights Center (HRC) to conduct fair housing testing in Commerce	By the end of 2024 and 2026	Citywide	Contact HRC in 2024 to establish baseline service records for Commerce and seek to increase outreach and service to residents, landlords, and housing professionals by 20 percent over eight years
	Continue to contract with HRC to provide residents with fair housing services and refer housing complaints to the HRC as appropriate.	Annually	Citywide	
	Conduct fair housing outreach and education workshops targeted for Commerce residents and property owners	Twice during the planning period (end of 2024 and 2026)	Citywide	
	Promote multi-lingual housing resources, including fair housing services, via the City’s website, City Hall, library, community center and on social media platforms.	Ongoing	Citywide	
	Participate in Gateway Cities Council of Governments (GCCOG) study on AFFH policy implementation study. Work with other Gateway Cities to identify collaborative efforts, especially in outreach and education.	December 2023	Citywide	
Housing Mobility and New Opportunities in High Resource Areas				
Program 1.3 - ADUs	Update the Zoning Code to comply with State requirements for ADUs, including AB 2221 and SB 897	End of 2023	Single-family residential neighborhoods	Facilitate construction of 16 ADUs between 2021 and 2029; aim to achieve 80 percent of the ADUs in single-family neighborhoods.
	Update the Zoning Code to comply with State requirements for ADUs, including AB 2221 and SB 897	End of 2024		
	Develop an information sheet/brochure on ADUs, including building requirements and the permitting process, that may be given to interested property owners and kept at the Planning/Community			

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	Development Department. This information should also be included on the City website			
	Develop and include a Fair Housing Factsheet, especially on Source of Income protection (i.e., use of public subsidies such as Housing Choice Vouchers for housing payments) in the ADU application packet.			
	Develop incentives to encourage development of ADUs, including financial assistance (from state programs if available) to assist lower income homeowners with construction, among others.			
Program 2.1 – First Time Homebuyer 2.0	Update City website to provide a link to California Housing Finance Agency (CalHFA) homebuyer assistance programs, as well as to HOP offered by LACDA	End of 2023	Advertisement Citywide; Modelo SP area	Provide first-time homebuyer assistance to 94 households through development of the Modelo Specific Plan (85 households) and Rosewood Village Specific Plan (9 households) through 2029.
	Partner with the City's Library Social Services Division to have information about the First Time Homebuyer 2.0 program available at the library and community centers.	Beginning in 2024 and annually thereafter		
	Pursue funding from State and federal programs to provide homebuyer assistance to lower and moderate income households.			
Program 3.1 – Mixed-Use Land Uses	As part of the General Plan update, develop objective design standards for the City's mixed-use land use areas	End of 2023	Atlantic and Washington Boulevard proposed Mixed-Use General Plan Land Use areas	Pursue development of 300 mixed use residential units.
	The City will contact developers in the area to inform them of potential opportunity sites, the established development standards, and other pertinent	Annually		

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	information. The City may also publish information online and at City Hall.			
Program 3.2 – Zoning Ordinance Amendments	Various amendments needed to comply with recent changes in State law and/or remove subjective language in the Zoning Ordinance	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Facilitate the development of 77 lower income units; aim to achieve 40 percent of the units for special needs households.
Program 3.3 – Lot Consolidation	As part of the Zoning Ordinance update, establish additional incentives for lot consolidation	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Notify housing developers during the planning period. Create six (6) developable sites.
	Notify housing developers of development incentives and opportunities for lot consolidation.	Twice during the planning period		
	Using the 6th Cycle Housing Element's sites inventory, consolidate City-owned parcels to create developable sites	By the end of 2025		
Program 3.4 – Streamlined Processing	Facilitate ministerial approvals for lot splits in the R-1 zone, consistent with SB 9.	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Facilitate the development of 77 lower income units; aim to achieve 40 percent of the units for special needs households.
	Continue to monitor permit processing times and investigate ways to streamline the process. Prioritize the review of projects that include affordable housing units.	Annually		
Program 3.5 – Incentives for Affordable Units for Large and Multigenerational Households	Establish additional incentives and/or development regulations to promote the development of rental and ownership housing with three or more bedrooms.	Zoning Ordinance Update by end of 2024	Citywide	Pursue development of 77 lower income housing units.
	To increase the number of affordable multi-bedroom units to accommodate larger low-income families, the City will pursue affordable housing for larger and	Annually		

2021-2029 Housing Element

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	multigenerational households using City-owned properties.			
	Explore options for larger units with interested developers and property owners			
Place Based Strategies for Neighborhood Revitalization				
AFFH Environmental Justice	New Environmental Justice Element policies addressing environmental conditions for new/rehabilitated housing will be applied to the sites in the Housing Element's inventory . These policies can help with issues of freeway and truck traffic in and around the City as well as industrial and commercial manufacturing land uses within Commerce.	Upon adoption of the City's Environmental Justice Element .	Citywide	Apply for at least one funding program
	Apply for and utilize cap and trade program funds from the Greenhouse Gas Reduction Fund (GGRF) for efforts such as tree planting and restoration, home energy efficiency, zero emission and plug-in hybrid vehicles, and affordable housing.	When program funds are available	Citywide	
Program 4.2 – Neighborhood Fix Up Program	Create informational brochures about the Neighborhood Fix-Up Program to have available at City Hall, other public locations and on the City website.	By the end of 2025	Citywide	During the planning period, assist 100 households with Neighborhood Fix-Up Program
Tenant Protection and Anti-Displacement				
Program 1.1: Adequate Sites for RHNA and No Net Loss	Complete redesignation of City-owned nonvacant sites for residential mixed use development, adequate to accommodate the remaining 76 units	General Plan Update by end of 2023; Zoning Code update by end of 2024.	Citywide	Facilitate the development of 247 units, consistent with the RHNA
	Maintain and update an inventory of the available sites for residential development and make it available on City website.	Annually		

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	Comply with SB 166. Develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863	End of 2024		
	Issue Requests for Proposal to solicit affordable housing development on the City-owned sites identified in the Sites Inventory.	July 2025		
Program 1.2: Replacement Housing	Update the Zoning Code to address the replacement requirements.	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Achieve 100 percent replacement of demolished affordable units.
Program 1.4: ELI and Special Needs Housing	Establish incentives and appropriate development standards that can be implemented to encourage development of housing for lower income households	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	Facilitate the development of 77 lower income units; aim to achieve 40 percent of the units for special needs households.
	Utilize City-owned sites to meet the housing needs of lower income households	Planning period		
Program 1.5: Alternative Housing Models	Establish incentives and appropriate development standards that can be implemented to encourage development of alternative housing models.	Comprehensive Zoning Ordinance Update by end of 2024	Citywide	
Program 4.3 – CDBG Home Preservation Grant Program	Promote the Neighborhood Fix-Up program on non-traditional media (such as Facebook and Instagram).	2021-2029	CT 5323.03 has the highest percentage of overcrowding and renter cost burden	Assist 40 households
Program 4.4 – Monitor and Preserve Affordable Housing	When the City receives notice of a potential conversion of the federally assisted units, contact the property owners to pursue options to preserve these units as affordable housing. s.	2021-2029	Citywide	Preserve 235 existing affordable units.

Program	Specific Commitments	Timeline	Geographic Targeting	Eight-Year Metrics
	All dwelling units that receive public assistance in the City (including rehabilitation assistance and land write-down projects) shall continue to have affordable housing agreements filed with the land to ensure the long-term affordability of the units.			

DRAFT

Quantified Objectives

For the 2021-2029 Housing Element planning period, the City has established the following quantified objectives.

Table 5-2: Quantified Objectives

	Extremely Low	Very Low	Low	Moderate	Above Moderate
New Construction	27	28	22	39	131
Rehabilitation	20	60	60	0	0
Conservation	117	118	0	0	0

APPENDIX A: PUBLIC OUTREACH

Overview

This Appendix contains information on the various public outreach efforts conducted during preparation of the 2023-2031 Housing Element.

Stakeholder Contact List

Table A-1 shows the stakeholder contact list used by the City for the General Plan Update (GPU), including the Housing Element. The table shows the name of the organization, their location and the organization's area of focus.

Table A-1: Commerce Stakeholder Contact List

Company/Organization	City	Elderly/ Seniors	Persons Experiencing Homelessness	Families (large families, female headed families)	Persons with disabilities	Persons with developmental disabilities	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
Meta Housing Corporation	Los Angeles									x	
Heritage Housing Partners	Pasadena									x	
Habitat for Humanity - Greater LA	Bellflower									x	
Century Housing Corporation	Culver City									x	
Mercy Housing	Los Angeles									x	
National Community Renaissance of California (National CORE)	Rancho Cucamonga									x	
Amcal Housing	Agoura Hills									x	
Bridge Housing	Los Angeles									x	
City Ventures	Irvine										x
Abundant Housing Los Angeles											
Abundant Housing Los Angeles											
Abundant Housing Los Angeles											

Company/Organization	City	Elderly/ Seniors	Persons Experiencing Homelessness	Families (large families, female headed families)	Persons with disabilities	Persons with developmental disabilities	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
Easter Seals Society of Southern California	Whittier	X			X	X					
Housing Rights Center	Los Angeles										
Shelter's Right Hand	Whittier			X							
LA ROSAH											
East Yards											
Hathaway Sycamores Child and Family Services	Commerce			x							
Telacu	Los Angeles									x	
East Yard Communities For Environmental Justice	Commerce										
Heart of Compassion Distribution Food Bank	Montebello		x				x				
Community Legal Aid SoCal.	Santa Ana	X	X	X							
Veterans of Foreign Wars	Santa Fe Springs										
California Association of Realtors	Los Angeles										
Whittier Union High School District	Whittier			X							
Los Angeles Commission on Assaults Against Women, Intervention and Prevention Services (Peace over violence)	Los Angeles	X		X	X						
Department of Rehabilitation, State of California	Los Angeles				X	X					
Southern California Rehabilitation Services (S.C.R.S.)	Downey				X	X					
Southeast Area Social Services Funding Authority (SASSFA)	Santa Fe Springs	X									
Community Legal Aid SoCal.	Santa Ana	X	X	X							

Company/Organization	City	Elderly/ Seniors	Persons Experiencing Homelessness	Families (large families, female headed families)	Persons with disabilities	Persons with developmental disabilities	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
Veterans of Foreign Wars	Santa Fe Springs										
California Association of Realtors	Los Angeles										
Penny Lane	Commerce		X	X			X				
Bienvenidos Family Services	Los Angeles			x				x			
Department of Children and Family Services	Commerce			x							
Department of Public Social Services Belvedere Office	Los Angeles			x							
Los Angeles Unified School District	Los Angeles			x							
Montebello Unified Sch District	Commerce			x							
AltaMed Health Services Corp	Commerce										
Immediate Medical Center	Commerce										
U.S. HealthWorks Medical Group	Commerce										
Concentra Urgent Care	Commerce										
Health Care Services Department	Commerce										
Enki Health and Research Systems Inc.	Commerce										
NARCOTICS PREVENTION ASSOCIATION	Los Angeles								x		
Siempre Viva	Los Angeles								x		
C.I.H. SERVICIOS GENERALES de A.A.	Commerce								x		
Commerce City Senior Citizens	Commerce	x									
East Los Angeles Community Youth Center	Los Angeles			x							
Eastmont Seventh Day Adventist Spanish Church - Food Distribution Center	Los Angeles		x				x				
Food Distribution Center - Door of Hope Ministries	Los Angeles		x				x				

Company/Organization City of Commerce Community Center - Food Distribution Center	City Commerce	Elderly/ Seniors	Persons Experiencing Homelessness	Families (large families, female headed families)	Persons with disabilities	Persons with developmental disabilities	Lower income households	Spanish speaking residents	Drugs/alcohol services/rehab	Affordable Developer	Market Rate Developer
			x				x				

Outreach Materials, Presentations and Summaries

The following pages contain the outreach materials, presentations and summaries during the General Plan Outreach process.

Pop-Up Workshop Summary



REIMAGINE COMMERCE

GENERAL PLAN UPDATE

I. Introduction

Purpose and Objectives

On Saturday, September 8, 2018, the City of Commerce hosted a pop-up workshop to launch its General Plan Update and receive initial feedback from the community. MIG assisted the City in the design and facilitation of the event that took place on Farrar Street at Atlantic Boulevard and attracted nearly 50 participants of all ages.

The pop-up workshop was an opportunity to showcase potential improvements to Commerce's built environment and streetscape and spark the imagination of the local community to visualize possibilities for the future of Commerce. The workshop was designed as an interactive activity, allowing participants to share their thoughts, ideas, and preferences with the project team through a variety of engagement tools.

The objectives for the demonstration pop-up workshop were to:

- Create a celebratory and interactive environment to engage and educate community members about the General Plan Update
- Demonstrate potential for vitality and attraction of investment and business
- Demonstrate a contextualized visualization of potential improvements to the street that will improve the area's quality of life for residents, business owners, employees, and visitors
- Confirm framework for Atlantic Boulevard area improvements and inform community members about the relationship to the General Plan Update process and timeline



Emerging Themes and Key Findings

Throughout the workshop and the various engagement activities several prominent themes emerged from the feedback provided by participants. Recommendations and ideas that received a lot of attention and high rankings throughout the different engagement activities were identified as emerging themes. These emerging themes indicate the community's priorities in terms of improving the quality of life in Commerce. As such they will help guide the development of the General Plan update.

- Access to affordable and healthy food - Many participants requested better access to a grocery store with healthy food options in Commerce. This request emerged as a key finding throughout many of the input tools and was one of the proposed improvements that received the most votes overall.
- Increased retail and restaurant options - Broadening the variety and number of restaurants and retail options on the main commercial streets in Commerce emerged as a priority for participants. Many identified Atlantic Boulevard as a preferred location for more restaurants as well as, to a lesser degree, Washington Boulevard. Several specific types of preferred retail services were identified by participants, including a grocery store, a bank and a drug store.
- Enhanced green space and vegetation - Many participants indicated the need for more green space and vegetation throughout the city. Providing a better connection to the natural environment, even through smaller interventions to the streetscape, was a key element in most participants' vision of the future for Commerce. Many envision a greener city with more bike and walking trails and more trees throughout the city.
- New recreation facilities - Creating new sports facilities as well as a dog park emerged as a preferred improvement for many of the workshop participants. They indicated that new opportunities for recreation and physical activity would help improve the quality of life in Commerce. This finding builds on participants' recognition that the city's parks and recreation facilities was one of its strongest assets.
- Encouraging clean businesses - Participants indicated the need to limit the location of heavy industrial businesses in Commerce and instead encourage clean and green businesses to locate in the city. The attraction of such businesses would help improve the environment in Commerce.

II. Format and Methodology

The pop-up demonstration event was designed as an interactive environment where participants could arrive at any point during the event and stay as long as they wish. The activities organized at several different stations aimed to attract and engage participants of all ages and backgrounds, including families, youth, and seniors. All materials were translated to Spanish, and at least one bilingual Spanish speaker from MIG was in attendance. Participants were asked to check-in at the sign-in table to receive an event passbook and information about the General Plan Update and Specific Plan development.

The event was organized by station and each station covered a different topic based on the various types of improvements and investment strategies that could be included in the General Plan. Participants were encouraged to visit every location to receive a passbook stamp and a small prize. The passbook helped guide participants through the activities and incorporate the community's input into contemplated changes along Atlantic Boulevard and the General Plan in general.

When a participant completed all activities, she/he turned in her/his passbook and received a raffle ticket for an opportunity to win a grand prize. Prizes of increasing value were raffled off throughout intervals of the day—attracting and maintaining the participation of more residents.

The event was designed to be festive with vibrant displays and signage. Each station included the following elements:

- Staged activity demonstrating potential improvements, interventions, strategies
- Displays to provide education about how these ideas contribute to and enhance a community
- Engagement tools to solicit input from the community regarding preferences for the ideas presented

Various engagement tools were available throughout the event. In most cases, participants were asked to use dot stickers to identify their preferences between different types of improvements. They were also invited to share their own ideas for improvements by either writing or drawing their vision for the future of Commerce. Each activity was staffed by members of the project team to encourage participants to provide input, provide assistance if needed, and answer any questions that community members had.



III. Summary of Community Input

Participants were encouraged to share their thoughts and ideas about the future of Commerce and what they would like to see improved or changed in the city as it evolves over the next decades. Community input was collected on a variety of different topics relating to Commerce's built environment and community amenities. The feedback collected through these interactive activities is summarized below by topic. Since participants were encouraged to select their top-two or -three preferred answer choices, the results of the dot-activities presented below should not be interpreted as percentages of total participants but, instead, should be understood as percentages of total dots.

The first input board asked participants where they live, work, and play in Commerce. Although not all participants answered this question, figure 1 below demonstrates that the majority of workshop participants were Commerce residents representing all residential neighborhoods of the city.

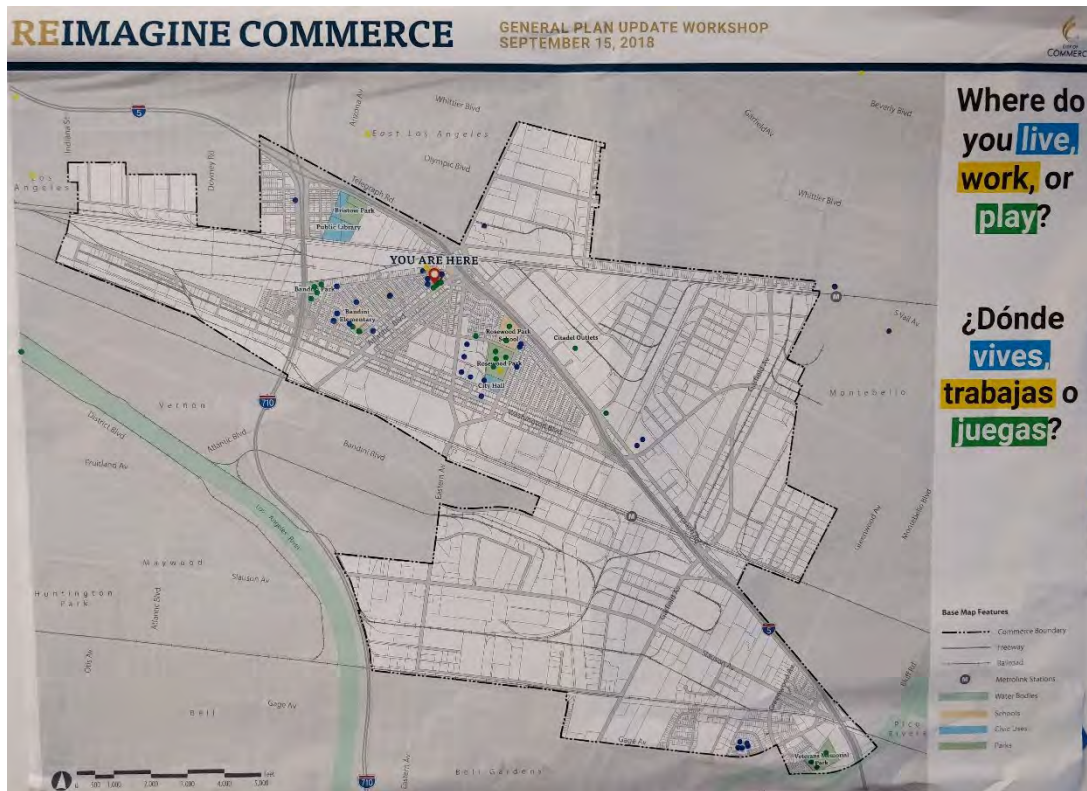


Figure 1: Where do you live, work, or play?

REIMAGINE COMMERCE

GENERAL PLAN UPDATE

What would you like to see more of in Commerce?

Participants were asked to identify what types of improvements or new amenities they would like to see more of in Commerce. Grocery stores received the most number of votes from participants, who were allowed to select up to three answer choices. Other preferences identified by participants included, in order of preference, more places to eat and shop, more housing options and plazas and open spaces. Other answer choices provided by participants included recommendations for specific types of grocery stores, such as Trader Joe's (identified by over 10 participants), as well as a desire to bring back the small town feel to Commerce. One participant requested adding a stop on the Metrolink shuttle line to better serve the community.

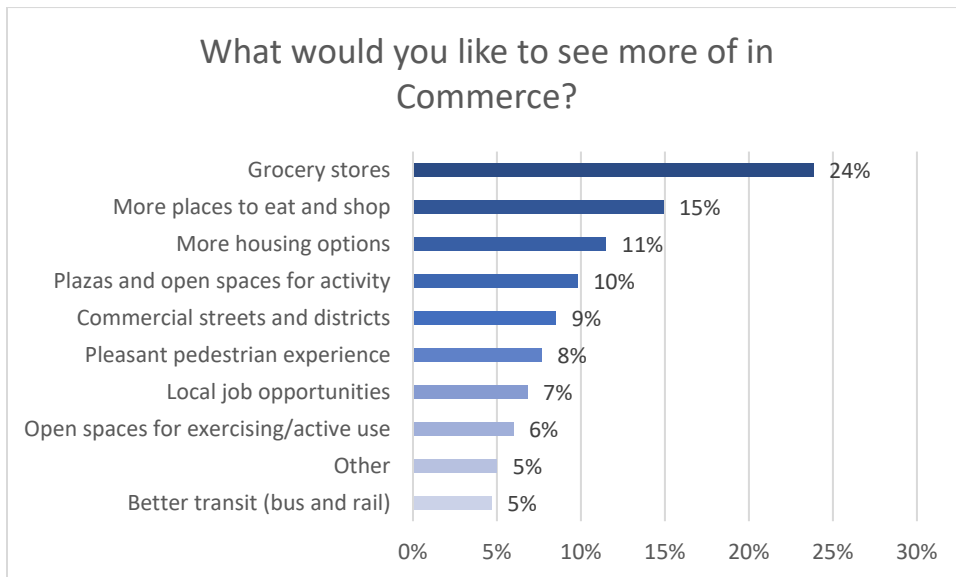


Table 1: What would you like to see more of in Commerce?



REIMAGINE COMMERCE

GENERAL PLAN UPDATE

What should Commerce prioritize to improve the environment?

Participants identified encouraging clean and green businesses as the top priority for Commerce to improve the environment. Other strategies, ranked as second-tier priorities by participants, included reducing noise and pollution by businesses and addressing vehicle pollution.

A recommendation provided by a participant in the “other” category encouraging the city to add more trees received many votes from participants. Combined with the answer choice “plant sustainable landscaping,” this recommendation would rank second in terms of priorities for improving the environment in Commerce. Other write-in answers provided by participants included providing free wifi for residents, providing public recycling bins, and improving the bus experience.

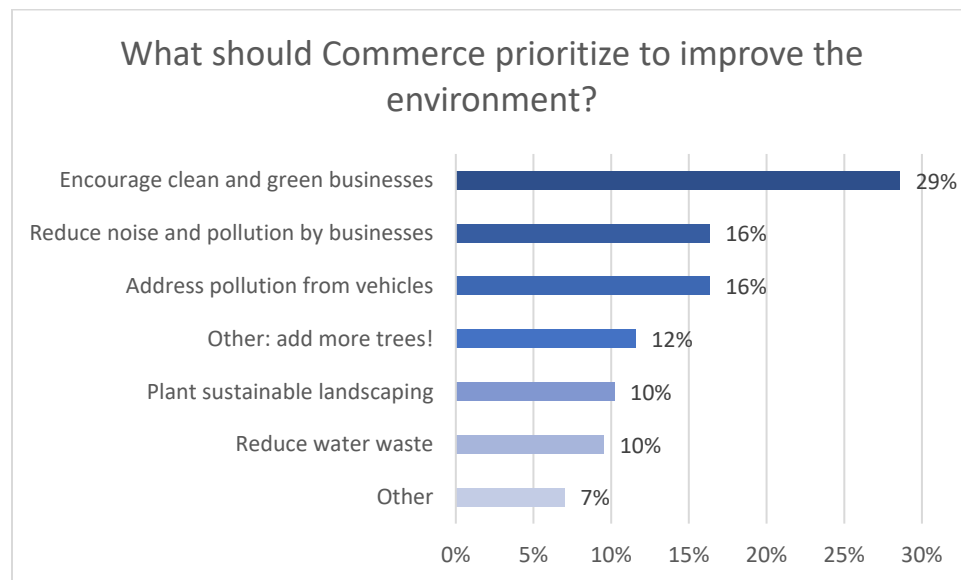


Table 2: What should Commerce prioritize to improve the environment?

REIMAGINE COMMERCE

GENERAL PLAN UPDATE

How can Commerce become a healthier place?

The top strategy identified by participants to help Commerce become a healthier place is encouraging healthy food markets. The two second-most preferred strategies were limiting the locations of heavy industrial business and reducing truck traffic near residential areas. Other recommendations provided by participants included increased beautification near the Veteran's memorial park, creating a farmer's market and redirecting truck traffic off Washington, with clearer signs.

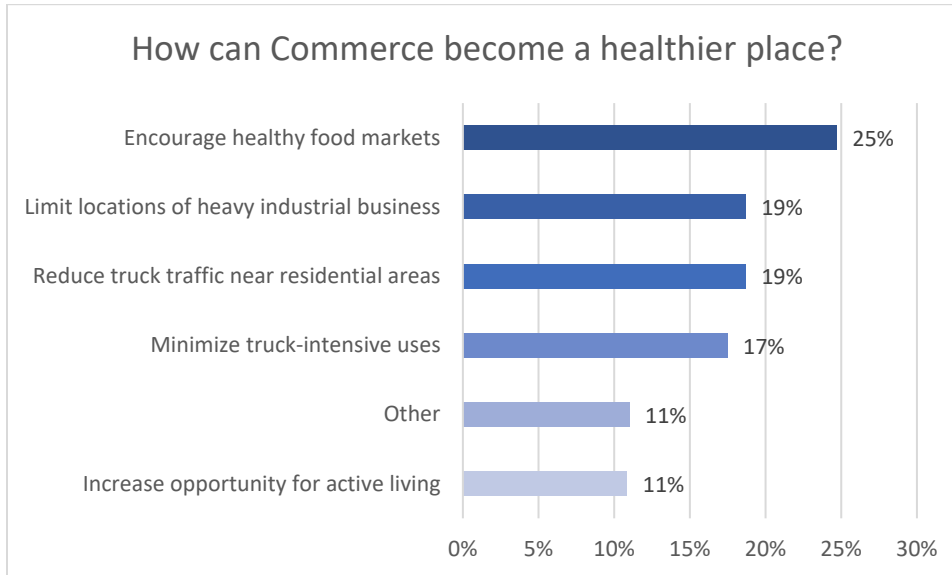


Table 3: How can Commerce become a healthier place?



REIMAGINE COMMERCE

GENERAL PLAN UPDATE

How can we improve our parks, recreation facilities, and open space so people can lead healthier lives?

The two preferred improvements to parks, recreation facilities and open space in Commerce were creating more walking and bike trails and improving existing facilities. Creating a high school and expanding the library was identified by several participants as another improvement to Commerce's quality of life.



Table 4: How can we improve our parks, recreation facilities, and open space so people can lead healthier lives?



Commerce should provide housing for...

The top two populations that Commerce should provide more housing for, according to workshop participants, are young homeowners and large families. Housing for low-income residents and seniors were identified as a lower priority for Commerce.

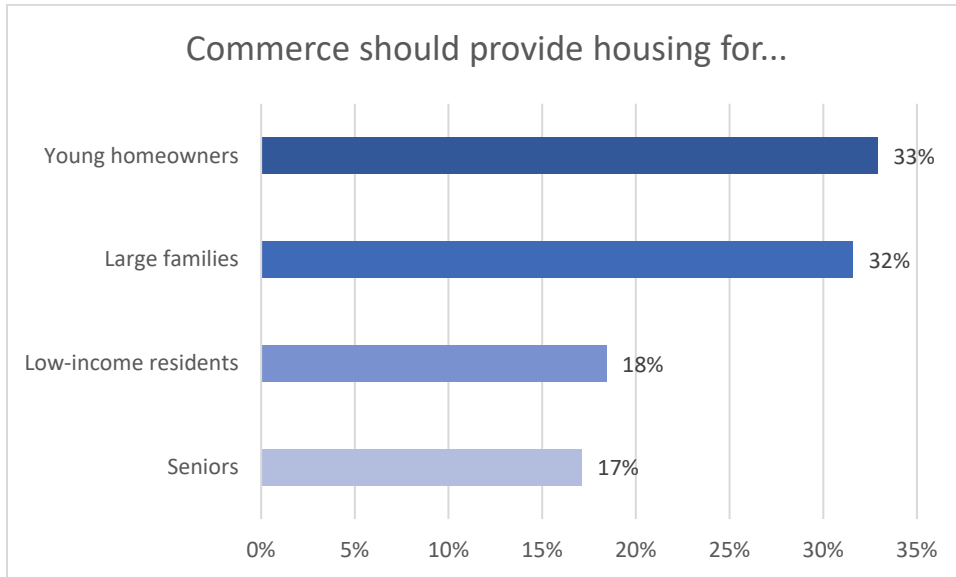


Table 5: Commerce should provide housing for...

What kind of improvements would you like to see to Atlantic Blvd?

Increasing the number and variety of restaurants as well as providing opportunities for entertainment were the top two preferred improvements that participants would like to see on Atlantic Blvd. Another improvement that received a significant amount of votes from participants was the creation of a dog park. This recommendation was provided by a participant as a write-in and received the third-most votes overall. Creating public plazas, gathering spaces, and pleasant pedestrian experiences were other improvements identified by many participants for Atlantic Blvd. Participants also recommended that additional amenities and services be available on Atlantic Blvd, such as a bank, a super market, and a drug store.



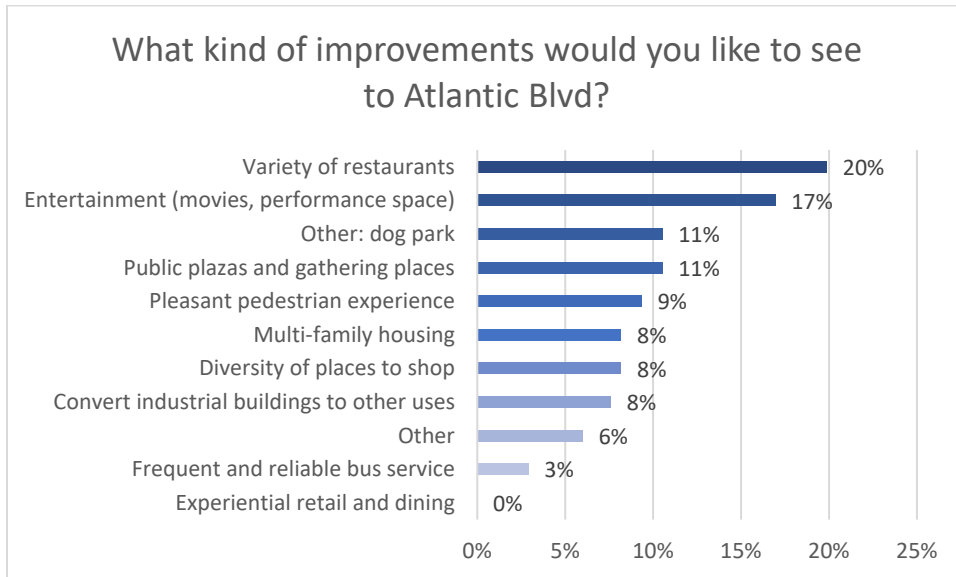


Table 6: What kind of improvements would you like to see to Atlantic Blvd?

What kind of improvements would you like to see on Washington Blvd

Similar to the findings for Atlantic Blvd, many participants would like to see a larger variety of restaurants on Washington Blvd. However, other findings differed as participants identified different types of uses for Washington Blvd than those identified for Atlantic. Furthermore, no clear favorites came out of the results with votes almost evenly distributed among several uses, including converting industrial buildings to other uses, providing a diversity of places to shop, and creating pleasant pedestrian experience. Other amenities and improvements proposed by participants included a high school, a nature trail or garden and a drug store.



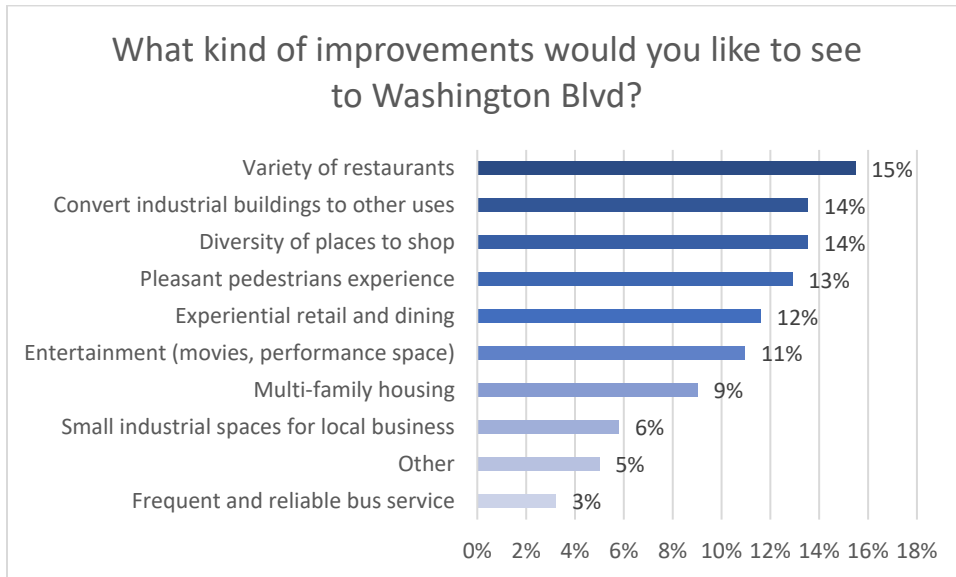


Table 7: What kind of improvements would you like to see to Washington Blvd?

What do you like most about Commerce?

Participants were asked to share what they most about Commerce in an open-ended question where participants were encouraged to write their answers. The most frequently mentioned local assets and benefits of living in Commerce were its many activities, especially for kids, and its parks and recreation facilities. Each asset was mentioned by nearly a third and a quarter of participants, respectively. All answers provided by participants fell into the following categories, organized in order of importance:

- Activities, especially for kids
- Parks and recreation facilities
- City services
- Community and local culture
- Transportation
- Retail options
- Representation by elected officials



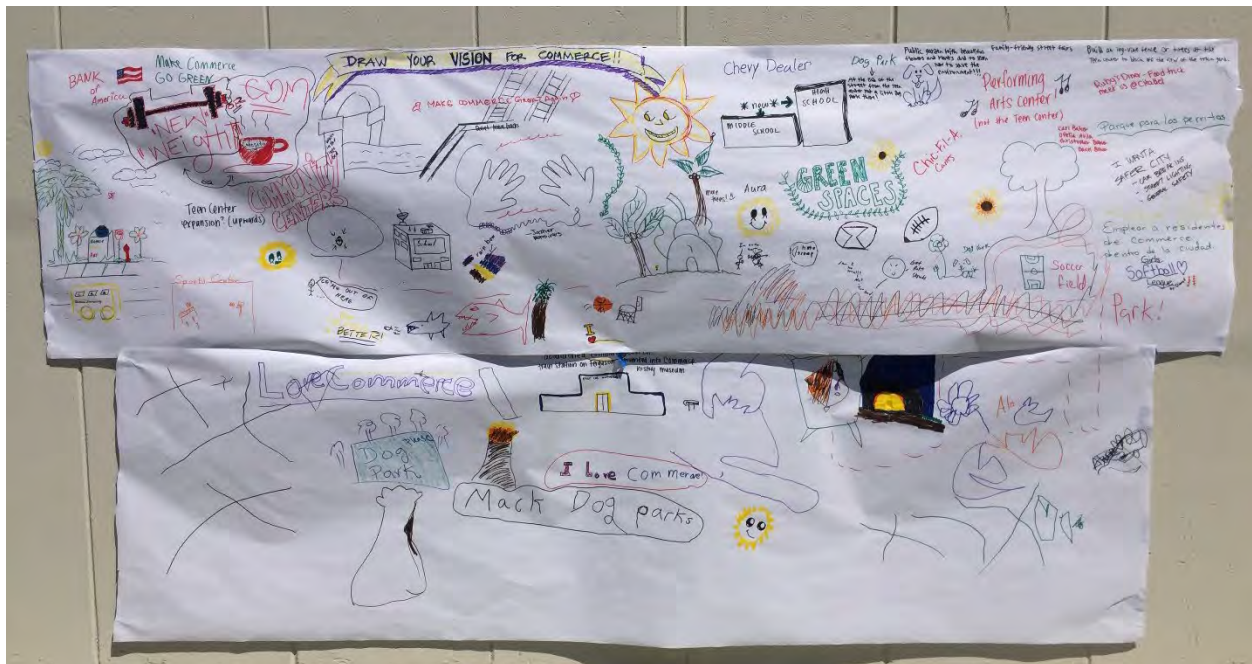
REIMAGINE COMMERCE

GENERAL PLAN UPDATE

Your vision for Commerce

Workshop participants were asked to envision Commerce's future and share what that vision would look like through drawings. Several key improvements emerged as priorities through this drawing exercise, with over half of the participants identifying more parks, green space and sports facilities in their vision for Commerce's future. Participants' vision for Commerce included the following key elements, listed in order of importance based on the number of times they were mentioned by participants:

- More parks and green space
- New sports facilities
- More retail options
- New or improved community centers
- New schools
- Better transportation
- More community events, especially family-friendly
- Improved neighborhood safety
- Local employment opportunities



IV. Next Steps

ReImagine Commerce
General Plan Advisory Committee
Meeting #1

December 19, 2018

SUMMARY

Introduction

On Wednesday, December 19, 2019 the City convened the first meeting of General Plan Advisory Committee. The purpose of the meeting was to provide the Committee with an overview of the process to update the city's General Plan, review the charge of the committee, and update on the work to date. Matt Marquez, Deputy Director of Development Services, welcomed the meeting and introduced Laura Stetson and Esmeralda García from MIG. He described that the city selected the consulting firm to lead the General Plan update.

The following is a summary of the Committee's discussion.

Outcomes

Laura and Esmeralda lead a round of self-introductions and asked committee members share their desired outcomes from the process.

- Commerce is ready for change and there are great benefits that can come from this.
- Best practices from other places will greatly inform how the community provides input on the future vision.
- The freeways and rail yards pose a challenge and this needs to be considered in the development of the General Plan update.
- Parks are important in our community and we need to understand how they are changing.
- The process needs to involve youth; they want to help shape future.

- It's important to see youth contribute ideas
- The long-range vision should be to see Commerce prosper.

Project Updates

The consultant team provided a brief presentation summarizing the work completed to date. This included the results of the first community workshop and planning strategies for Atlantic Boulevard, Washington Boulevard, and the Housing Opportunity Overlay. Committee members asked the following questions and comments.

- Will the team host pop-up demonstrations in other parts of the city? It would be important to have events throughout the city and provide more publicity so there is a great turn out.
- Does the team plan to coordinate with Bicycle and Pedestrian Master Plan committee?
- How will warehouses be addressed?
- We need to plan for more housing.
- Is the proposed Gold Line alternative going to be unground? This will help reduce congestion?

The consultant team facilitated a discussion to get feedback into the planning strategies for Atlantic Boulevard, Washington Boulevard, and the Housing Opportunity Overlay. These were shared with the City Council and Planning Commission and feedback from the GPAC is the next step in the process. The committee provided the following comments.

- Survey business community to see what types of activities and uses they would like to see after 6:00 p.m. The team can assess what types of businesses would address these needs.
- Consider amenities for employees to stay a little longer after hours. Places where they can dine, go out for drinks, etc.
- Many businesses would like amenities for all employees, especially when off-shift.
- There is a need to provide housing opportunities for the local workforce.
- There will always be traffic and parking impacts. Look at ideas to address this. For example the residents near Steven's Stake House have issues with patrons parking in the neighborhood.
- The ideas for Atlantic Boulevard area a good vision.

- Improve local transit to improve connections.
- Create more walkable places
- Add more landscaping and improve the tree canopy. Trees are also a good way to improve the air quality.
-
- Plan for housing that meets the needs of the younger generation. Look at these current trends.
- New housing should include childcare centers.
- The way workers use office space has evolved and current trends include on site amenities and a different environment.
- Consider the WeWork model when planning for office space.
- Co-housing is a good option.
- Like the co-housing idea
- Denser development is a good option and should be considered as an opportunity to address housing needs. Single family homes will be too expensive.
- There is little access to healthy food. Consider a food desert grant (Federally subsidized) to attract a supermarket.
- Housing for young adults wanting to move back to Commerce is needed.
- Look at Millennials as we shape our new vision.
- Commerce has fallen behind in residential development.
- Arrange a site visit and tour of places to inspire our vision and identify opportunities.
- Provide examples from abroad.
- Undergrounding utilities will improve aesthetics.
- Prioritize a supermarket. The city should look for incentives such as purchasing a property and leasing it (almost cost-free) to a grocery store.
- Make sure adequate parking is available.

The team discussed a standing time for the GPAC to meet over the next year. The group agreed on the 4th Tuesday of the month. The committee will take a break in January and begin convene on February 26, 2019 at 6:00 p.m.

General Plan Advisory Committee

Meeting #6

July 30, 2019

SUMMARY

Introduction

On Tuesday, July 30th, 2019 the City convened the sixth meeting of the General Plan Advisory Committee (GPAC). The focus of the meeting was to elicit input about new land uses in Commerce.

Previous Meeting Recap

The comment regarding motels is general.

- *The group discussed that motels along Atlantic Boulevard are an eyesore and undesirable.*

The following is a summary of the Committee's discussion.

Areas for Opportunity

Ms. García introduced an aerial map of Commerce displaying assets and major corridors, an updated map based upon feedback from June's meeting of the GPAC, and a legend depicting uses that resulted from the community visual survey that was distributed during the first phase of community engagement. She facilitated a discussion to gather ideas about new uses the GPAC members would like to see in different parts of the city and exactly where they should be.

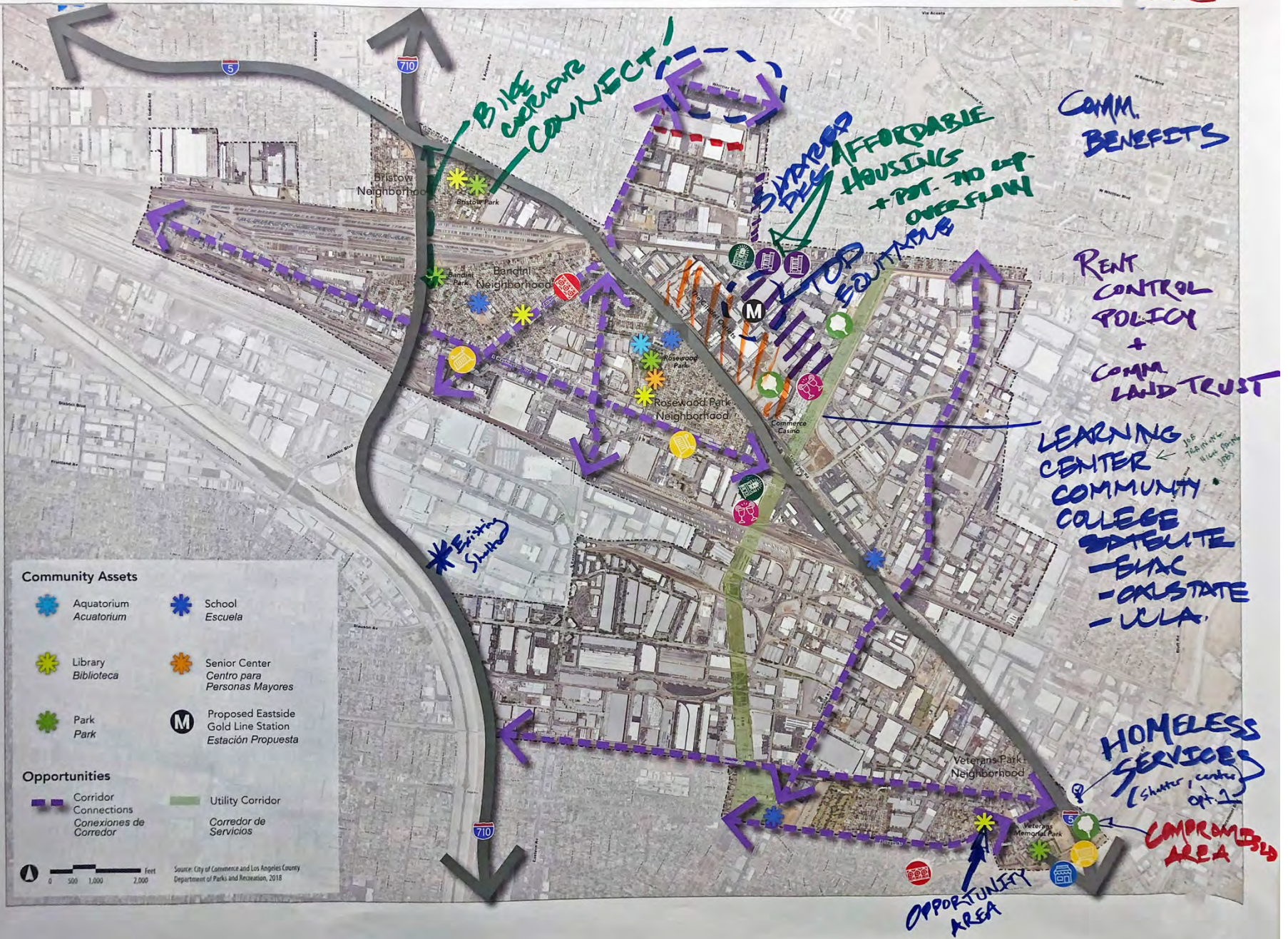
GPAC members had the following comments:

- Address existing issues in the General Plan.
 - Homelessness is increasing annually in the region and the Plan should consider how to provide for that population.
 - Parking spaces, both on and off-street, for residents are a major need throughout Commerce.
 - Amenities for day workers vs. amenities for permanent residents are disproportionate in favor of day workers who do not live in Commerce.
- Ensure careful planning if I-710 freeway is improved.
 - Provide site(s) for relocation of displaced residents.
 - Consider community benefits as a development requirement.
- Consider proposed Metro light-rail station as a unique opportunity for a vibrant plan area.
- Consider a transit-oriented development (TOD) near the proposed Metro light-rail station.
 - Maximize the use of land near the Metro station.
 - Balance parking availability between residents and transit users. Provide parking as a premium for residents and consider shared parking options.
 - Make the TOD equitable and accessible for all.
- Enhance the Target shopping center and leverage success of food trucks and local businesses.
- Consider diverse types of business.
 - Some industrial areas could be converted to other land uses.
 - Commerce is currently the #3 port city in the U.S.
- Add a life skills center in Commerce.
- Provide better connections within the Bristow neighborhood.
 - Create bike corridors.
- Provide homeless shelter/center services in the Veteran's Park neighborhood.

Action Items/Next Steps

- The GPAC members can email comments on the previous meeting summary to General Plan team by August 5, 2019.

The team reminded the committee members that the next meeting will take place on August 27, 2019 at 6:00 p.m.



General Plan Advisory Committee

Meeting #7

August 27, 2019

S U M M A R Y

Introduction

On Tuesday, August 27th, 2019, the City convened the seventh meeting of the General Plan Advisory Committee (GPAC). The focus of the meeting was to elicit input about the emerging vision and guiding principles for Commerce.

The following is a summary of the Committee's discussion.

Emerging Vision

Ms. García introduced Commerce's emerging vision and community values that incorporate the feedback from the GPAC and this summer's community engagement events. She facilitated a discussion to confirm the vision and guiding principles. The GPAC members provided a variety of comments on the overarching vision and provided ideas for consideration in the General Plan update.

Circulation and Connections

- Improve and strengthen transportation connections to from the southern (residential) side of Commerce to the area on the north (Citadel).
 - Consider constructing a pedestrian bridge from Ferguson Drive over the rail yard.
 - Improve mobility at Ferguson/Goodrich/Atlantic to address the bottle neck. This causes access and safety issues for the residents in the Ferguson neighborhood.
 - Plan intentional connections along Atlantic Boulevard, Telegraph Road, and Eastern Avenue for residents and visitors.

- Plan for increased traffic as a result of all proposed development projects.
- Reexamine and reestablish Goodrich Blvd's full connection into the Mix Master.
- Increase the amount of parking in residential areas.
- Consider shared parking programs in residential areas.

Housing

- Create more housing in Commerce.
- Make housing more affordable and stable.
- Emphasize affordability and stability
- Consider options to retrofit motels along Atlantic Boulevard, possibly for affordable housing or apartments for the homeless.

Economic Development

- Incorporate the daily workforce into the community fabric.
 - Incentivize workers to stay after 5 pm to shop.
 - Give workers a vested interest in Commerce's amenities and services.
- Bring a supermarket into Commerce.
- Balance support for Commerce's "legacy businesses" and new businesses.

Services

- Provide quality medical care for Commerce residents.
 - Build Commerce a medical facility.
- Look at the Altamed medical facilities as an example.
- Bring amenities into Commerce that engage and activate the local community.
- Provide more amenities after business hours.

Community Health

- Mandate and enforce healthy noise and pollution levels.
 - Consider making Commerce carbon neutral.
 - Plant more street trees that produce oxygen.
- Update and upgrade Commerce's local businesses.
 - Provide City-sponsored programs to help local businesses operate "cleaner and greener."
- Build community gardens in Commerce.

- Consider cooperative ownership models for Commerce businesses as a strategy to implement green practices while addressing the needs of community members in need.
 - Bring thrift shops into Commerce.
- Create innovative solutions to address issues related to community members experiencing homelessness.
 - Consider policies that partner with Commerce industrial businesses for using parking during non-business hours for community members residing in vehicles.
 - Provide services such as bathrooms.
- Consider available uncontaminated land for agricultural uses such as community gardens.

The group had a question regarding the planned improvements for the I-5 project, specifically the schedule. Staff will follow up with other departments to follow up with the group.

Closing

Ms. García summarized the input provided during the meeting and informed the group that Committee would address the community benefits during the September meeting. In preparation she asked the group to think about the types of community benefits that will inform the General Plan Update.

She reminded the group that they can email comments on the previous meeting summary to General Plan team by September 2, 2019. The next meeting will take place on September 24th, 2019 at 6:00 p.m.

General Plan Advisory Committee

Meeting #8

September 24, 2019

S U M M A R Y

Introduction

On Tuesday, September 24th, 2019, the City convened the eighth meeting of the General Plan Advisory Committee (GPAC). The focus of the meeting was to elicit input about the draft vision for Commerce and potential community benefit.

The following is a summary of the Committee's discussion.

Draft Vision and Guiding Principles

Ms. García introduced Commerce's draft vision and guiding principles that incorporate the feedback from the GPAC, the community survey, and this summer's community engagement events. She facilitated a discussion to confirm the vision and guiding principle components and explained that these drafts will lead to the vision statement and guiding principles. The GPAC members provided a variety of comments on the overarching vision and guiding principle statements and provided ideas for consideration in the General Plan update.

- Ensure the vision has a consistent active voice
- The term "green" should be defined
- The statement regarding transportation network should improve air quality.
- Improving human health is important and the statement related to addressing noise and pollution should be bolder

Community Benefits

Landscaping

- Include trees that will oxygenate and provide canopy
- Use best environmental practices for public landscaping (non-harmful products and xeriscaping)
- Consider “green/living walls” in publicly visible spaces

Plazas and Open Spaces

- Consider nontraditional seating areas in medians
- Use visual examples:
 - Pasadena Paseo
 - Portland mall - Multi-modal, active transportation

Meeting Places

- Include meeting spaces on rooftops
- Require visible, welcoming privately owned public spaces

Bikeways

- Require bikeway access to and from private developments

Housing

- Provide affordable housing for both low- and middle-income residents, including workforce
 - Use community’s median income to determine respective goal amounts for affordability
 - Build cooperative housing for disabled and veteran residents

Local Restaurants

- Allow small storefronts, pop-up businesses, and kiosks
- Add a coffee shop near the Metrolink stop/parking lot
- Use good examples:
 - Anaheim GardenWalk
 - Mercado—stalls for mom-and-pops with a shared commercial kitchen
- Encourage developer to implement programming

- Developer should contribute offsite amenities (commercial kitchen or open space) if unable to provide onsite

Parking

- New housing/dwelling units will increase the need for traffic and parking solutions
 - Consider bundled/shared parking requirements between developers. Use examples like New York.
 - Cars are projected to get smaller and smaller in the next ten years

Housing

- Create an accessory dwelling unit (ADU) policy

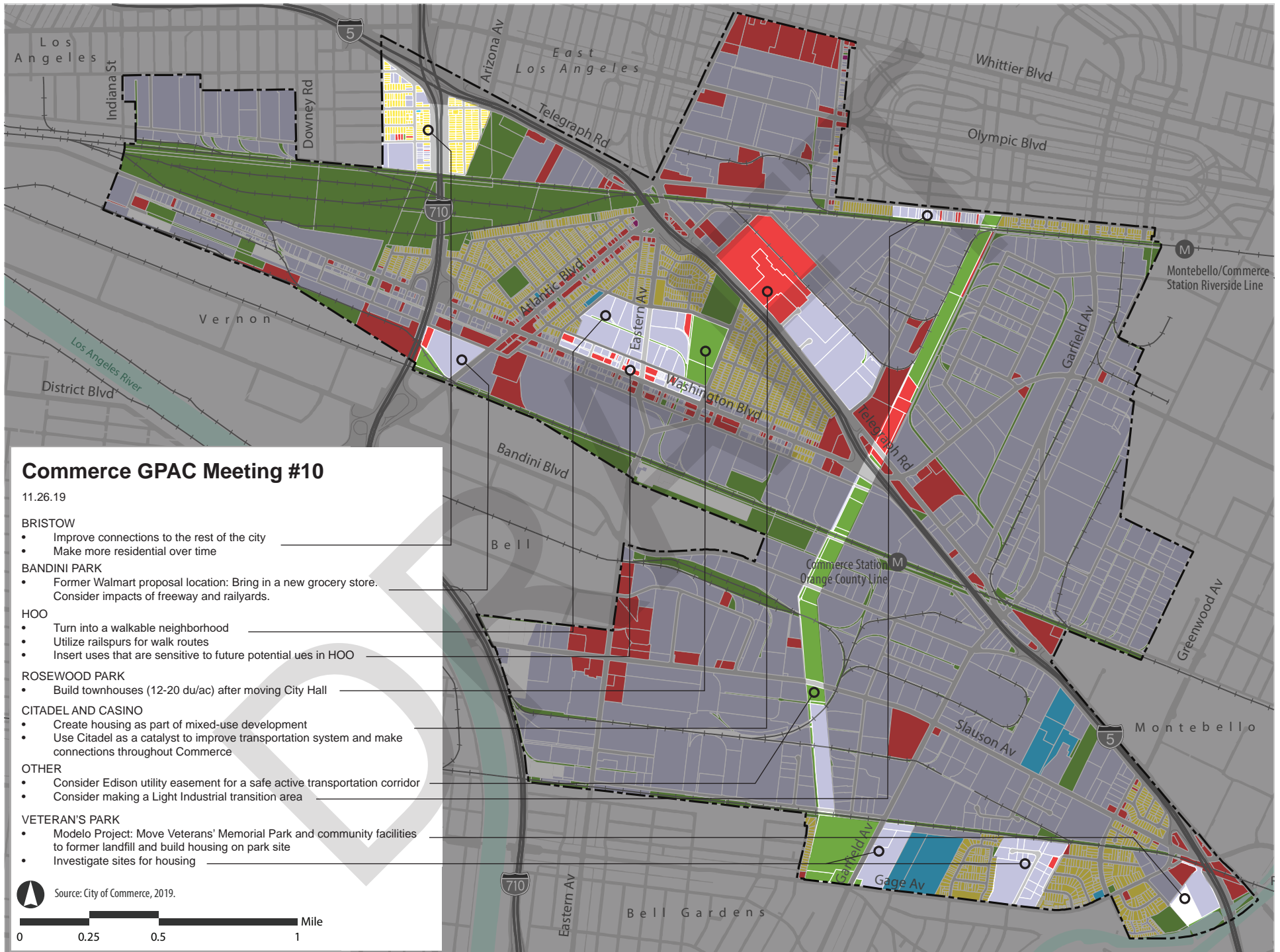
Railways

- Improve communication between residents and Union Pacific railway

Closing

Ms. García summarized the input provided during the meeting and informed the group that Committee would discuss land use during the September meeting.

She reminded the group that they can email comments on the previous meeting summary to General Plan team by September 30, 2019. The next meeting will take place on October 22nd, 2019 at 6:00 p.m.





City of Commerce Community Workshop


Housing Element Update November 17, 2022



Agenda

- Introductions and Welcome
- General Plan
 - Housing Element Overview
- Special Housing Needs
- Next Steps
- Share Your Thoughts

Meeting Format and Zoom Tools

How to Use 
Video Conferencing

Black menu bar at top or bottom of screen:



Audio

Please mute yourself when not speaking

Video

Participants

- See Others
- Rename Yourself (Name & Group/Agency Affiliation if applicable)
- Raise Hand (remember to lower after)

View

Gallery/Speaker
View of videos and screen share can be changed in top right corner

Poll Question #1

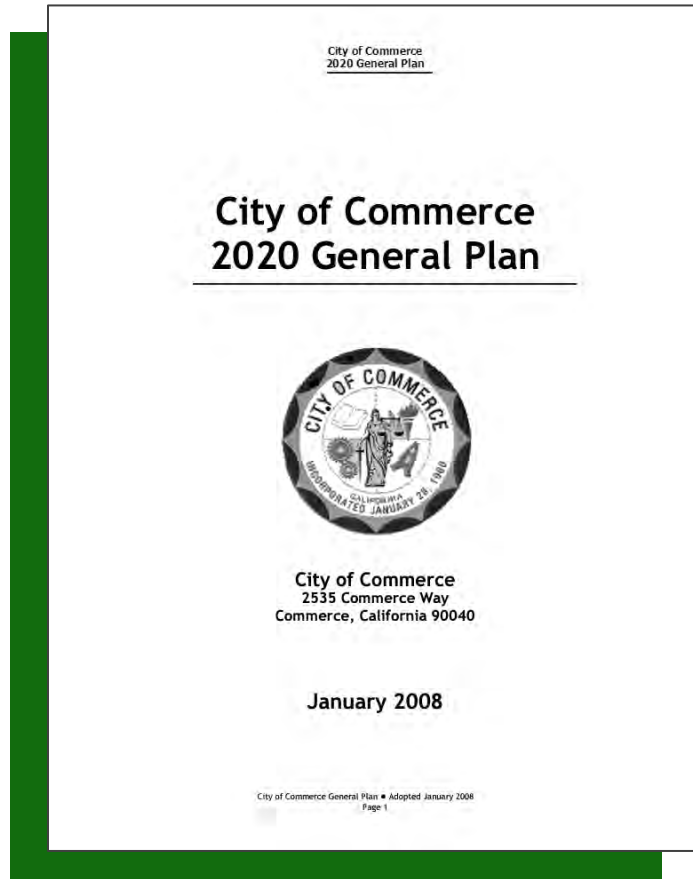
What special needs group does your organization represent?

- ☐ Seniors
- ☐ Immigrants
- ☐ Low income households
- ☐ People experiencing homelessness
- ☐ People with disabilities
- ☐ Female-headed households
- ☐ Other

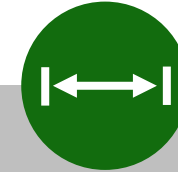


General Plan Overview

A General Plan is...



High-level policy document required by State law



Long-range in scope



Blueprint for change over time



Focused on 15-20 years outlook

General Plan Elements





Housing Element

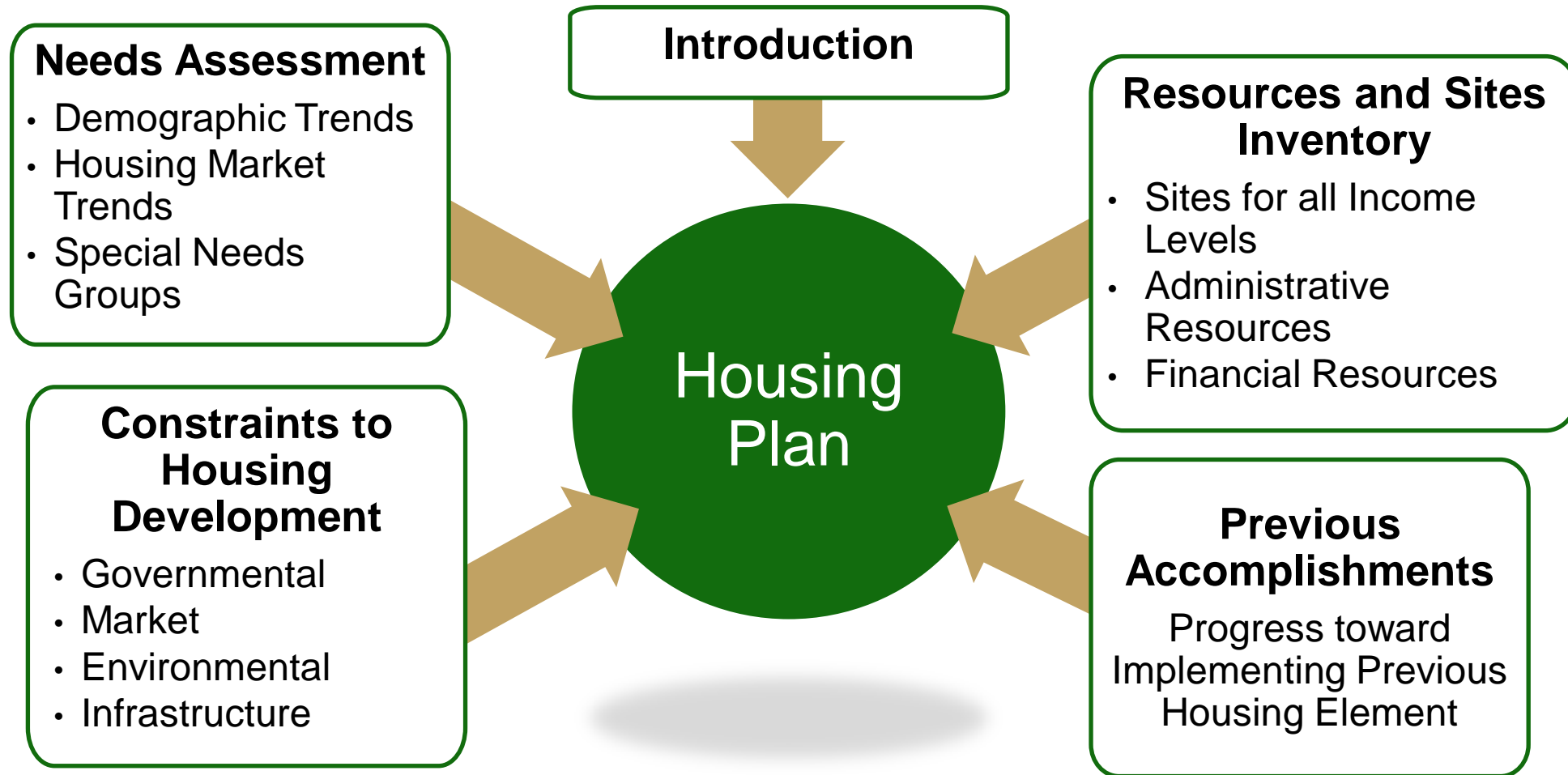
What is a Housing Element

- A State-required element of the General Plan
- Only General Plan element that requires review and “certification” by a State agency, the Department of Housing & Community Development (HCD)
- 2021-2029 update due October 15, 2021

Housing Element Legislative Intent

“The availability of housing is of **vital statewide importance**...[and] local and state governments have a responsibility to use the powers vested in them to **facilitate the improvement and development of housing** to make adequate provision for the housing needs of **all economic segments** of the community.”

What is in a Housing Element?



Poll Question #2

Are your organization's participants mostly:

- ☐ Homeowners
- ☐ Renters
- ☐ Not sure
- ☐ Other

What is Affordable Housing?

- **Affordable housing:** A household pays no more than 30% of its annual income on housing
- **Cost burden:** When monthly housing costs (including utilities) exceed 30% of monthly income



39% of all Commerce households

and

54% of low-income households experience housing cost burden

Income Limits for Los Angeles County

Income Level	1-Person	2-Person	3-Person	4-Person	5 Person
Extremely Low (0-30% AMI)	\$25,050	\$28,600	\$32,200	\$35,750	\$38,650
Very Low (31-50% AMI)	\$41,700	\$47,650	\$53,600	\$59,550	\$64,350
Low (51-80% AMI)	\$66,750	\$76,250	\$85,800	\$95,300	\$102,950
Moderate (81-120% AMI)	\$76,500	\$87,450	\$98,350	\$109,300	\$118,050
Area Median Income (AMI)	\$63,750	\$72,900	\$82,000	\$91,100	\$98,400

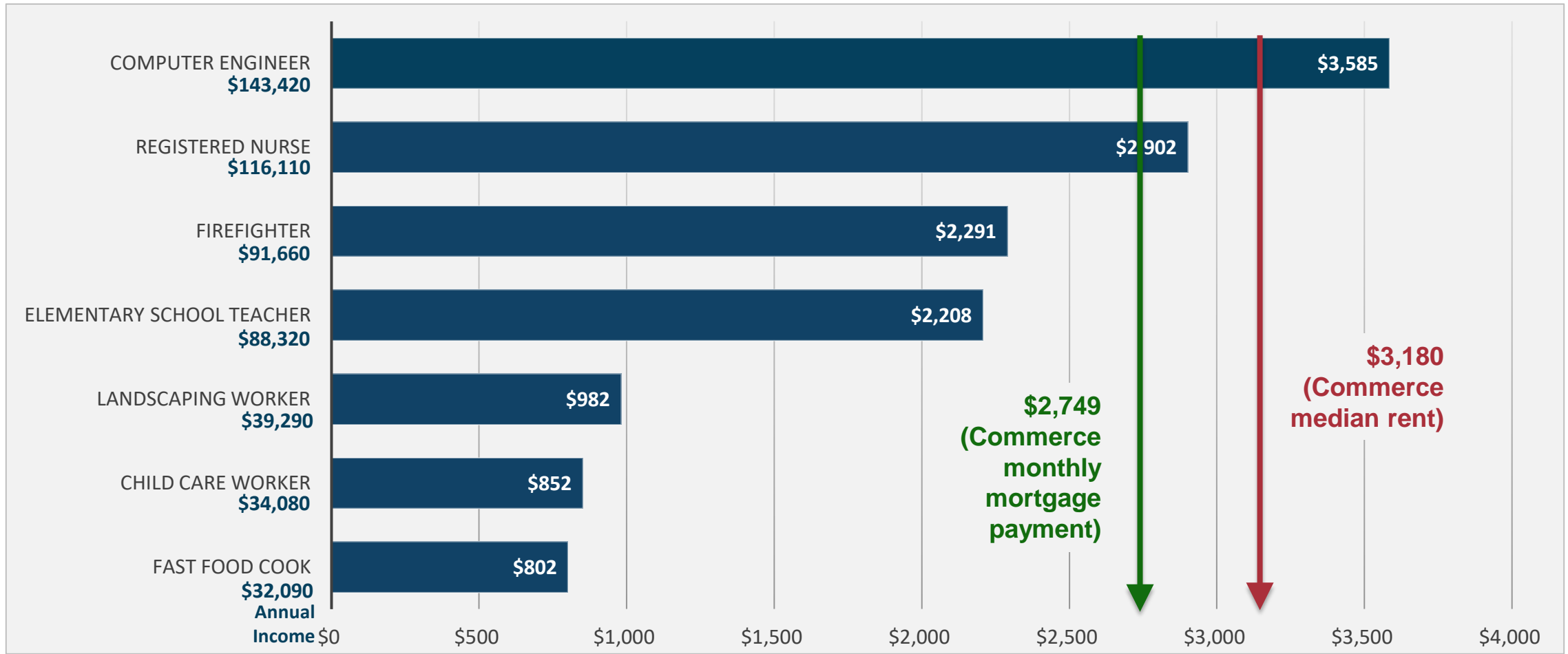
Affordable housing = 30% of household income

Example: $\$90,100 \times 30\% = \$27,030 / 12 \text{ months} \rightarrow \$2,252 \text{ per month}$

AMI = Area Median Income

Los Angeles County AMI = \$91,100 (family of 4)

Housing Cost v. Income



*For a median priced home; Source: Zillow.com mortgage data; Zumper rent trend data November 2022

What is the RHNA?

Regional Housing Needs Assessment:

(Asignación Regional de Necesidades de Vivienda)



HCD determines
RHNAs for each
Council of
Governments



RHNA for
SCAG region:
1,341,827
housing units



RHNA for
Commerce:
247 housing units

Commerce RHNA by Income Group

Income Group	% of AMI	Annual Income Range*	Commerce 2021-2029 RHNA	% Of Units
Very Low	0-50%	\$0 - \$38,650	55	22%
Low	51-80%	\$38,651 - \$61,840	22	9%
Moderate	81-120%	\$61,841 - \$92,760	39	16%
Above Moderate	120% +	\$92,760 +	131	53%
Total			247	

*A range of household incomes that represents a percentage of the area median family income (MFI). The 2022 MFI for a family of four in Los Angeles County is \$91,100. Source: SCAG, 2020; CA HCD 2020 Income Limits

Goals for accommodating new housing need through comprehensive land use policies and planning (zoning)

(not a construction obligation)

Neighboring RHNA Allocations

Jurisdiction	Population	Housing Units	Units for 2021 – 2029 RHNA
Commerce	12,868	3,468	247
Bell Gardens	42,449	10,012	503
Montebello	63,544	20,051	5,186
Downey	113,529	35,838	6,525
Pico Rivera	63,374	17,173	1,024
South Gate	97,003	24,540	8,282
Los Angeles County	10,172,951	3,590,574	812,060

Meeting the RHNA

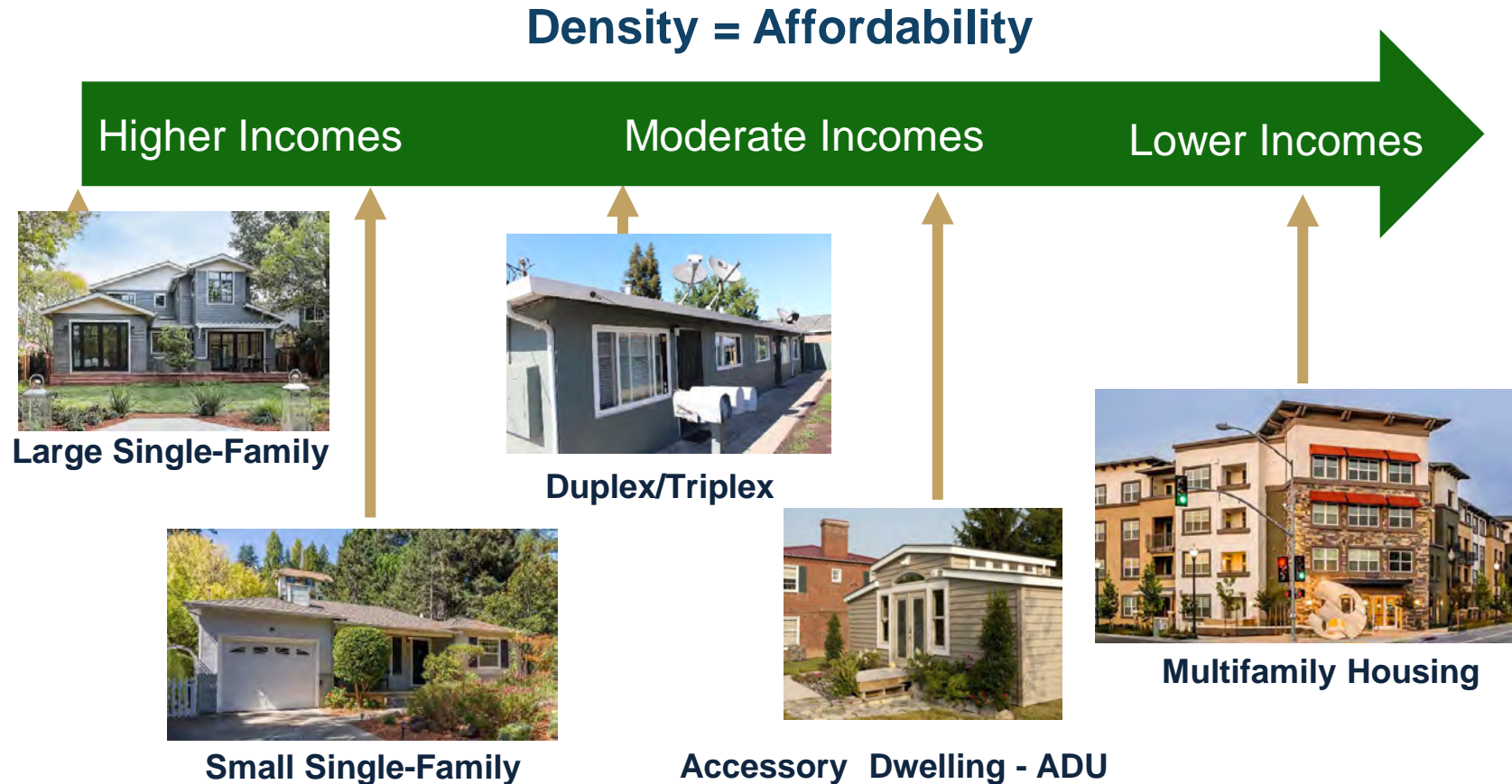
1 Approved housing and mixed-use projects

2 Projects in the development process

3 Potential sites for new housing

- Vacant sites
- Underutilized sites that could redevelop
- Accessory dwelling units

How Do We Assign Affordability?



What does density look like?



30
units per acre



42
units per acre



60
units per acre

Affirmatively Furthering Fair Housing (AFFH)

Meaningful actions to combat discrimination, overcome patterns of segregation and **foster inclusive communities** free from barriers that restrict access to opportunity.

Special Housing Needs

Special Needs Groups

- Housing element law requires an analysis of housing needs for residents in specific special needs groups
- These groups often spend a disproportionate amount of their income on safe and decent housing and are sometimes subject to discrimination



Persons with Disabilities



Large Households (5+ members)



Female Headed Households



Elderly (65+ Years)



Agricultural Workers

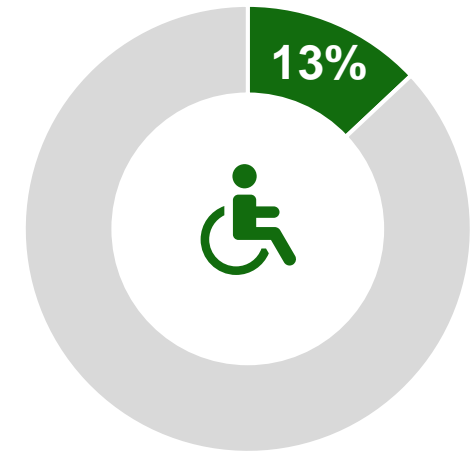


People Experiencing Homelessness

Persons with Disabilities

- Disabled residents typically have limited incomes and often receive Social Security income only, which means their monthly income is often devoted to housing costs.
- They may face difficulty finding accessible housing (heights of installations and cabinets, wheelchair access, etc.) because of limited number of such units

Commerce residents
with a disability

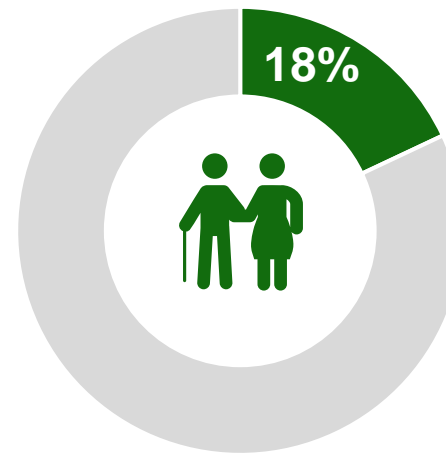


Disability Type	Percent
Hearing Difficulty	2.2%
Vision Difficulty	2.9%
Cognitive Difficulty	6.5%
Ambulatory Difficulty	7.2%
Self-Care Difficulty	4.0%
Independent Living Difficulty	6.9%
Total with a Disability	13.4%

Elderly 65+

- Senior-headed households have special needs due to:
 - Low incomes
 - Disabilities
 - Dependency needs

Commerce Senior Population



30% of seniors have a disability

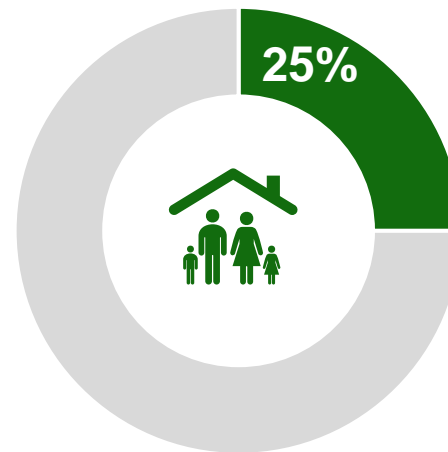


14% of seniors live alone

Large Households (5+ members)

- Large households are defined by HCD as containing five or more persons
- These households require adequately sized and affordable housing units, which can be difficult to acquire
- A lack of this type of housing could lead to doubling-up with other families and overcrowding

Large Households in Commerce



Of these large households



31% are renter households

vs.



69% are owner households

Agricultural Workers

- Agricultural workers have difficulty finding affordable and safe housing due to low wage and high housing costs



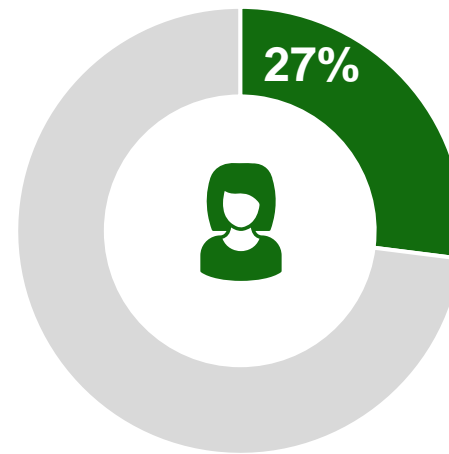
0.5% of Commerce residents are **agricultural workers***

*Agricultural workers includes agriculture, forestry, fishing, and hunting

Female Headed and Single Parent Households

- Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, due to only one income

Commerce Female-Headed Households



35% of female-headed households live in poverty

and

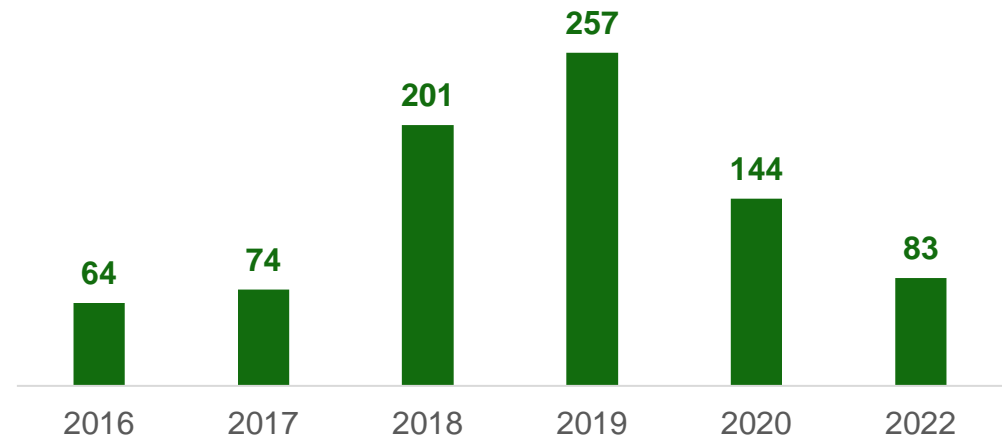
Over **60%** of all households living in poverty are female-headed households

People Experiencing Homelessness

- Homelessness results from a combination of factors, such as loss of employment, inability to find a job due to lack of skills, and high housing costs in comparison to incomes
- Chronic health problems, physical and mental disabilities, and substance use could also lead to homelessness

83 unsheltered individuals were counted in Commerce.

The number has decreased since 2019.





Next Steps

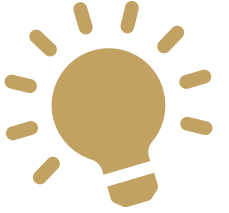
Schedule and Next Steps

- November 17 – December 16: Citywide online housing survey
- December 1 or December 8: Joint City Council/Planning Commission study session
- February 13: Joint City Council/Planning Commission study session
- Spring 2023: Preliminary draft housing element released for public comment



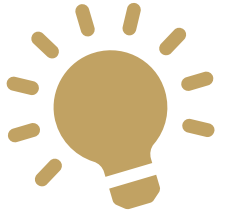
Share Your Thoughts

Your Ideas



What are the major special housing needs issues/challenges in Commerce?

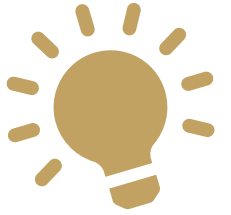
Your Ideas



What types of special needs housing are particularly needed in the community?

What kinds of supportive services should be included in the housing for your clients?

Your Ideas



Where can new housing catering to your clients be accommodated in the City? Any locational considerations?

What are creative solutions to address special housing needs in Commerce?



Housing Element Workshop

Taller de Elemento de Vivienda

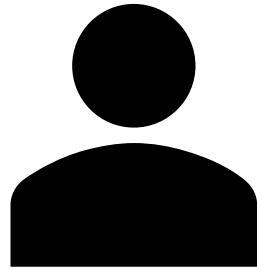
February 28, 2023



Agenda / *Agenda*

- Welcome & Introductions
 - Setting the Stage
 - What We've Heard So Far
 - Commerce Today
 - A Housing Element is...
 - Your Thoughts
 - Next Steps
- *Bienvenida y presentaciones*
 - *Preparando el escenario*
 - *Lo que hemos escuchado hasta ahora*
 - *Commerce hoy*
 - *Un Elemento de Vivienda es...*
 - *Sus pensamientos*
 - *Próximos pasos*

Workshop Facilitators / *Facilitadores del Taller*



[INSERT
HEADSHOT]
Viviana Esparza
Interim Director
Commerce



Ignacio Rincon
Contract City Planner
Commerce



Lisa Brownfield
Principal
MIG



Veronica Tam
Principal
Veronica Tam & Associates



Alfonso Ramirez
Project Associate
MIG

How to Use Video Conferencing

Black menu bar at top or bottom of screen:



Audio

Please mute yourself when not speaking

Video

Participants

- See Others
- Rename Yourself (Name & Group/Agency Affiliation if applicable)
- Raise Hand (remember to lower after)

View

Gallery/Speaker View of videos and screen share can be changed in top right corner





Setting the Stage

Preparando el escenario

The General Plan is a visionary document that identifies if and how a city will grow and change

The Housing Element is:

- One of 7 required General Plan elements
- Required to be updated every 8 years
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El Plan General: Un documento para planear el crecimiento y desarrollo urbano

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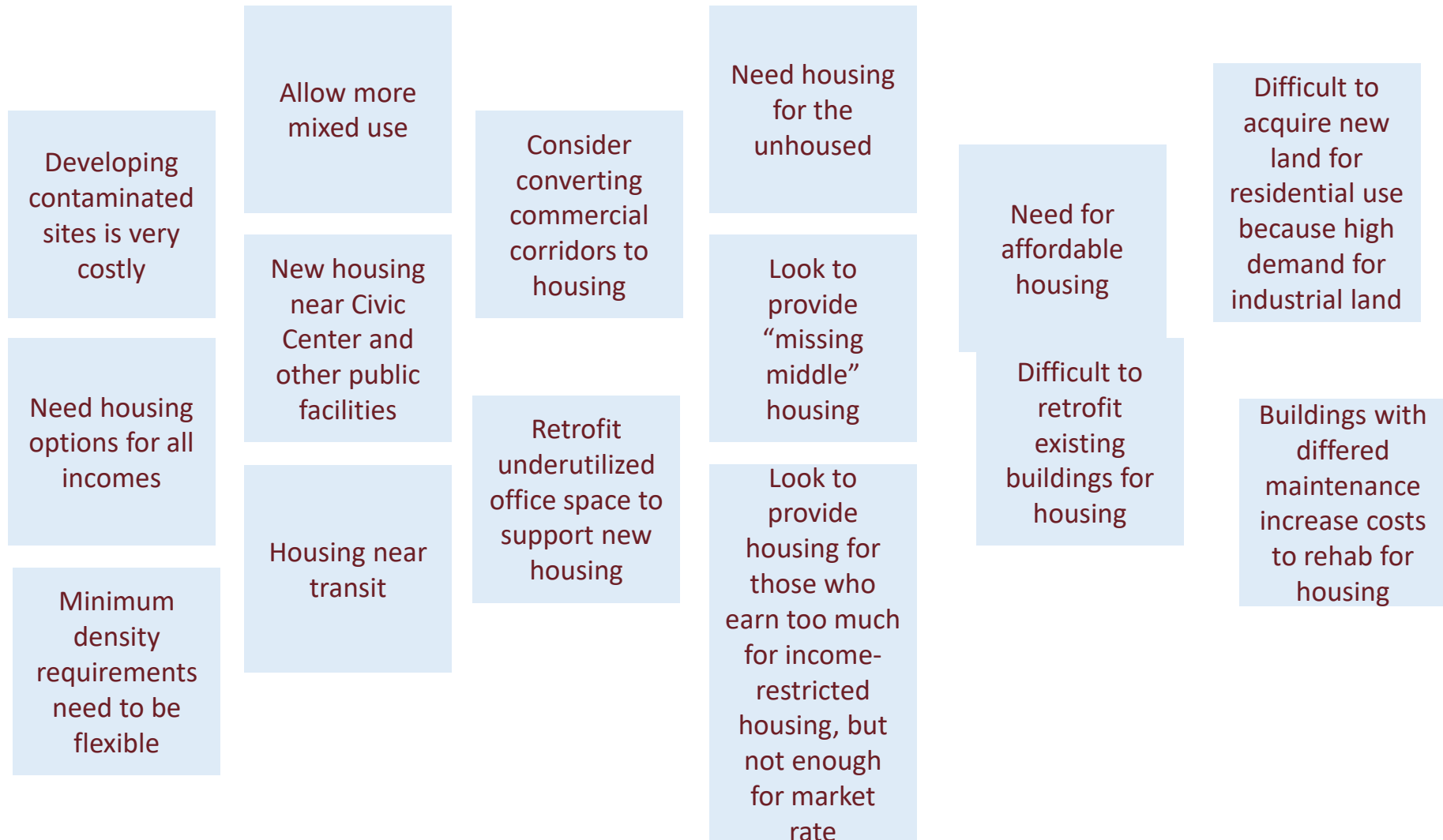
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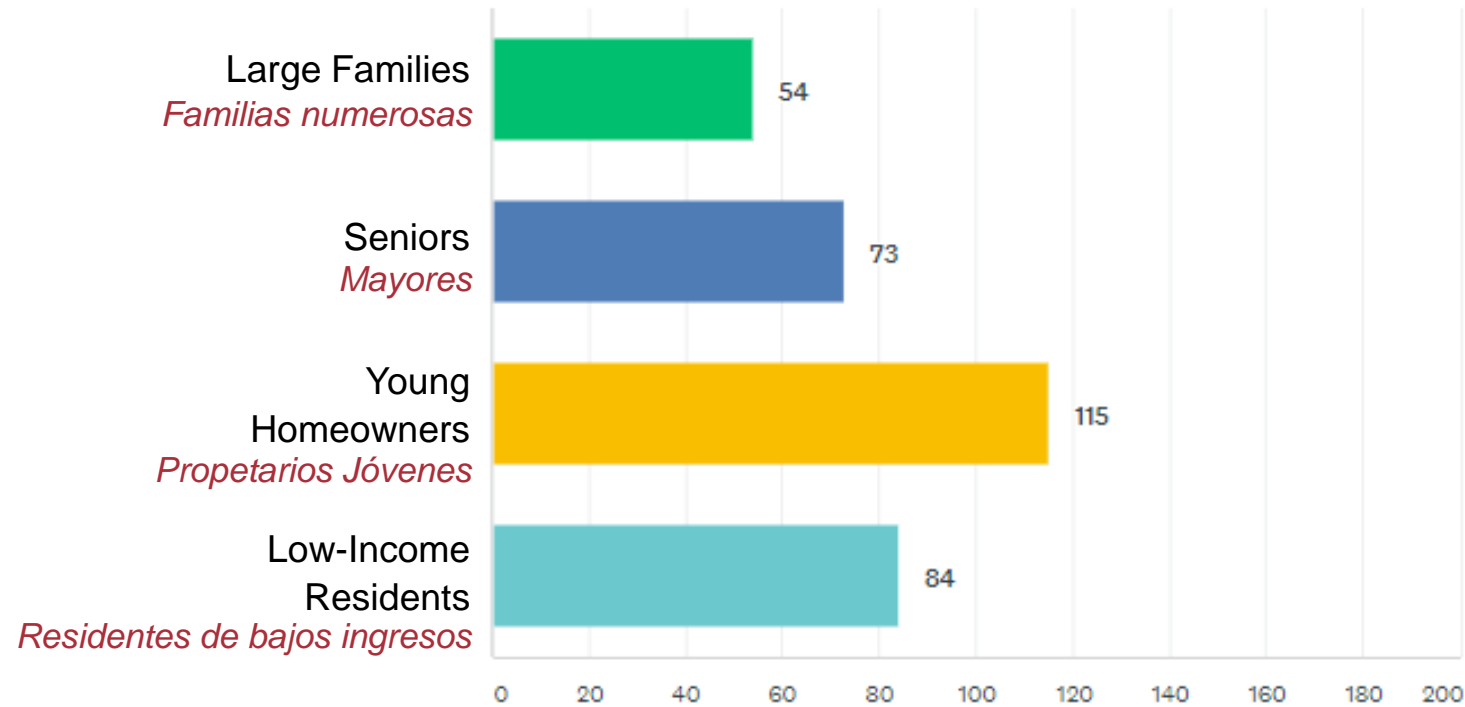
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Commerce should provide housing for...

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170 Respondents / Encuestados



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Commerce Hoy

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Housing Element Content

Contenido del Elemento de Vivienda



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RHNA for
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RHNA for
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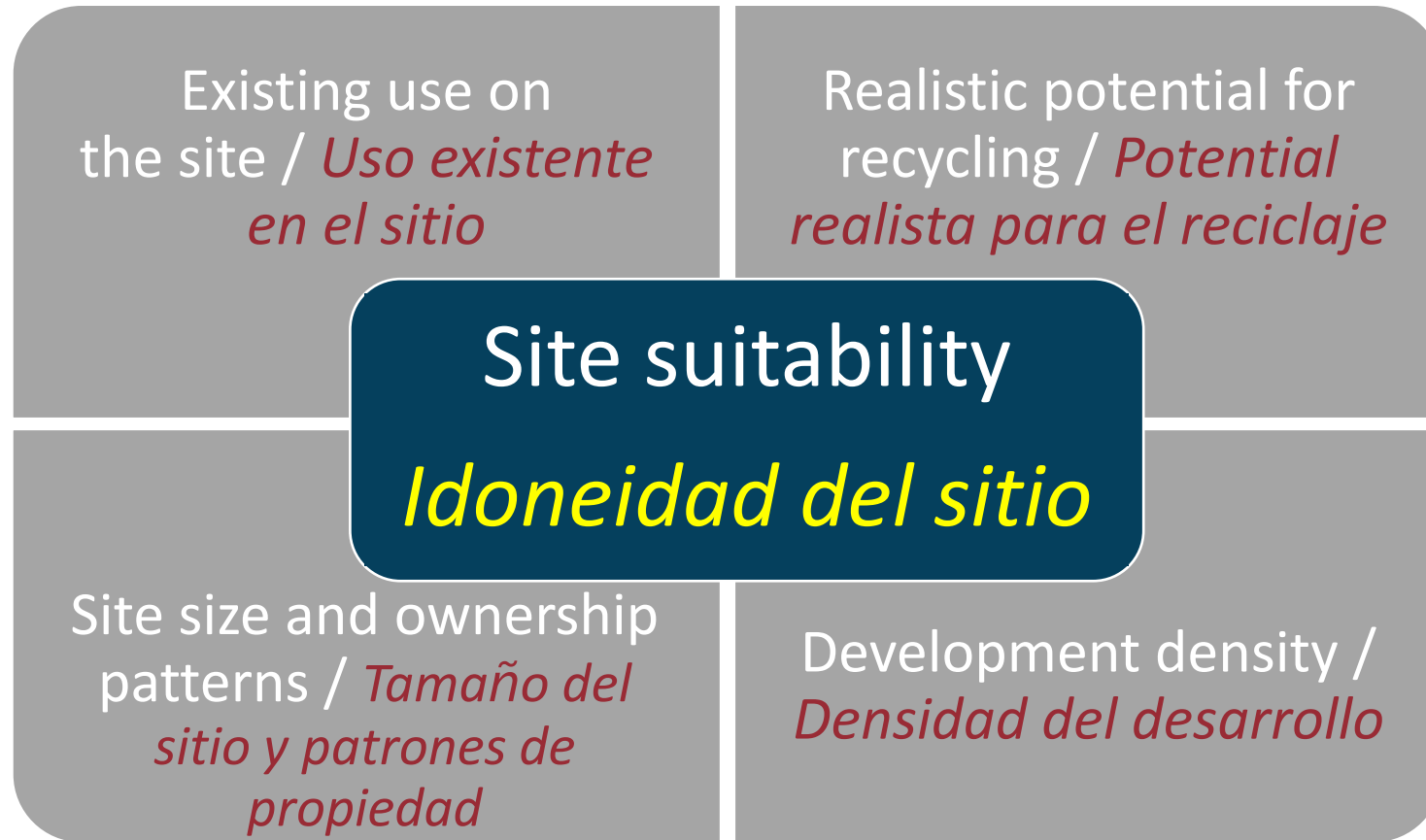
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Mute/Unmute
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Raise Hand
Mano arriba

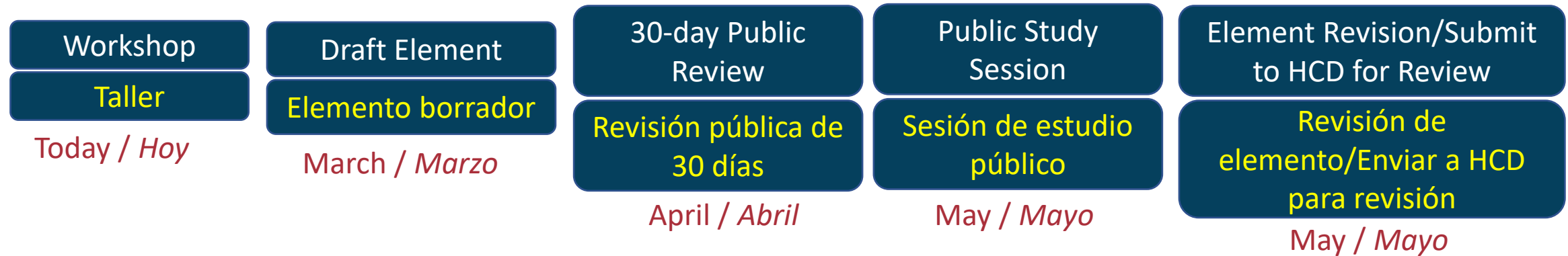


Next Steps

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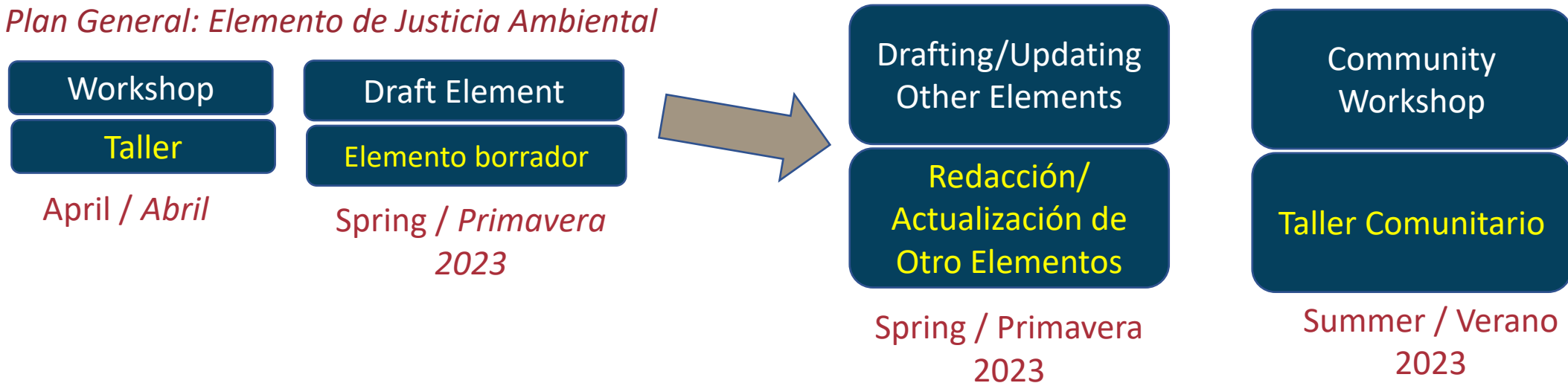
Timeline / Línea de tiempo

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General Plan : Environmental Justice Element

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Housing Element Workshop

Taller de Elemento Vivienda

February 28, 2023







Housing Element Workshop

Taller de Elemento de Vivienda

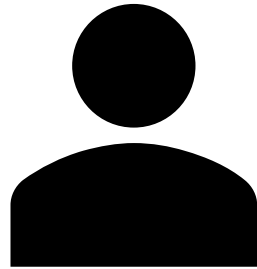
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Agenda / *Agenda*

- Welcome & Introductions
 - Setting the Stage
 - What We've Heard So Far
 - Commerce Today
 - A Housing Element is...
 - Your Thoughts
 - Next Steps
- *Bienvenida y presentaciones*
 - *Preparando el escenario*
 - *Lo que hemos escuchado hasta ahora*
 - *Commerce hoy*
 - *Un Elemento de Vivienda es...*
 - *Sus pensamientos*
 - *Próximos pasos*

Workshop Facilitators / *Facilitadores del Taller*



[INSERT
HEADSHOT]
Viviana Esparza
Interim Director
Commerce



Ignacio Rincon
Contract City Planner
Commerce



Lisa Brownfield
Principal
MIG



Veronica Tam
Principal
Veronica Tam & Associates



Alfonso Ramirez
Project Associate
MIG

How to Use Video Conferencing

Black menu bar at top or bottom of screen:



Audio

Please mute yourself when not speaking

Video

Participants

- See Others
- Rename Yourself (Name & Group/Agency Affiliation if applicable)
- Raise Hand (remember to lower after)

View

Gallery/Speaker View of videos and screen share can be changed in top right corner





Setting the Stage

Preparando el escenario

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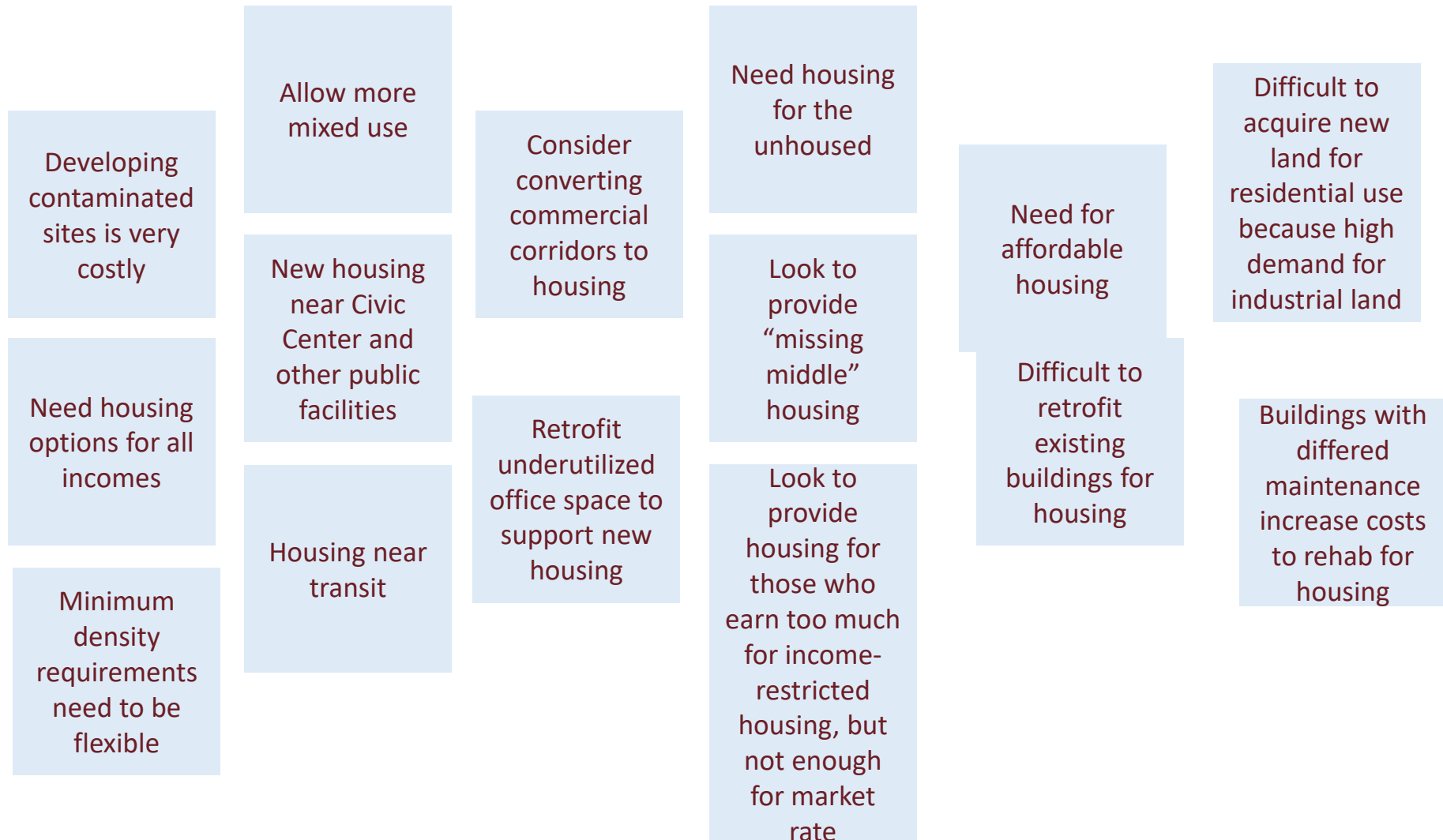
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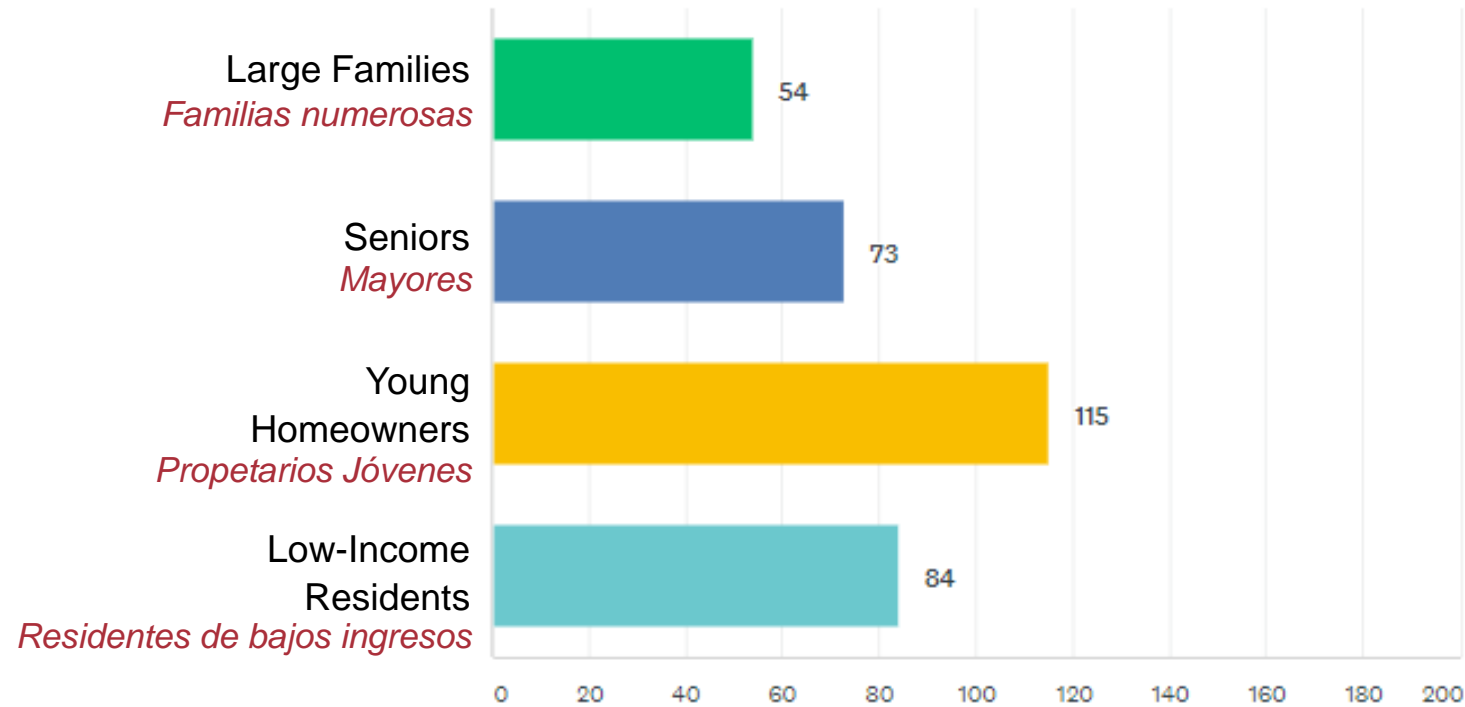
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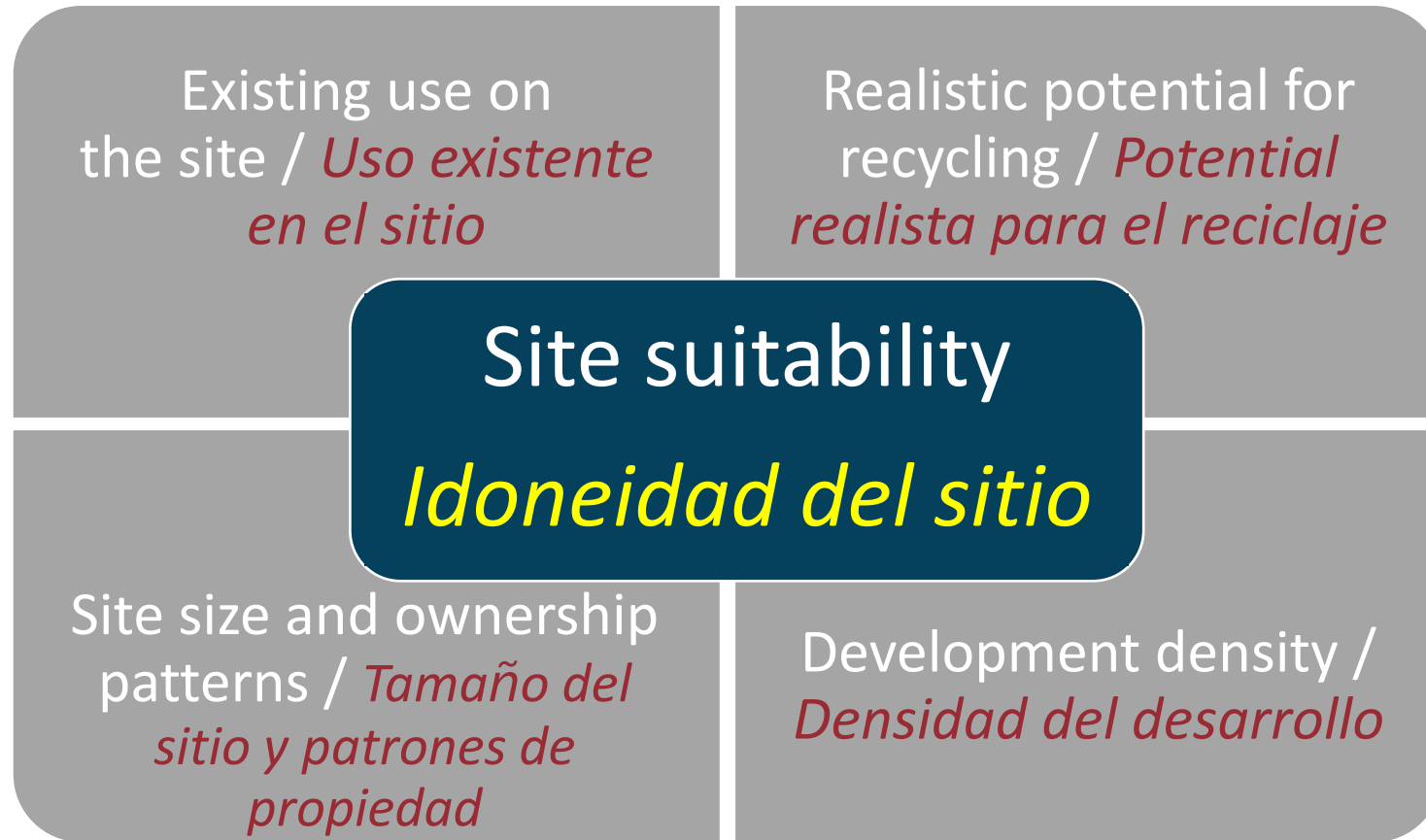
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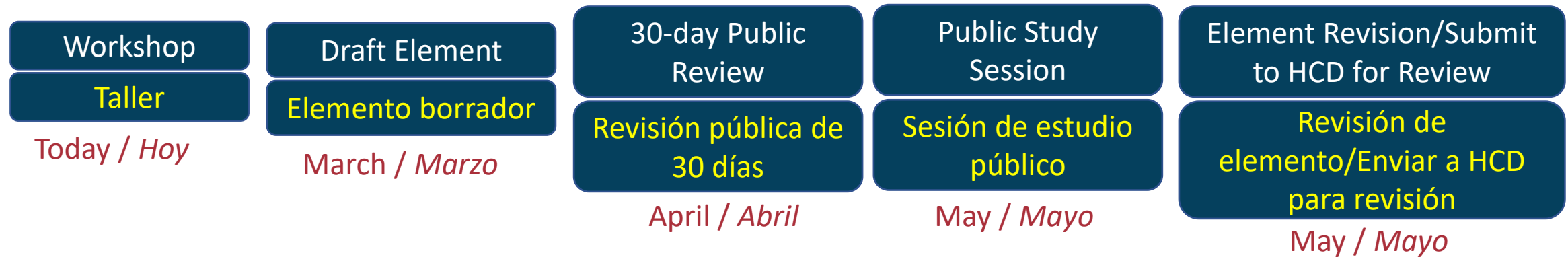


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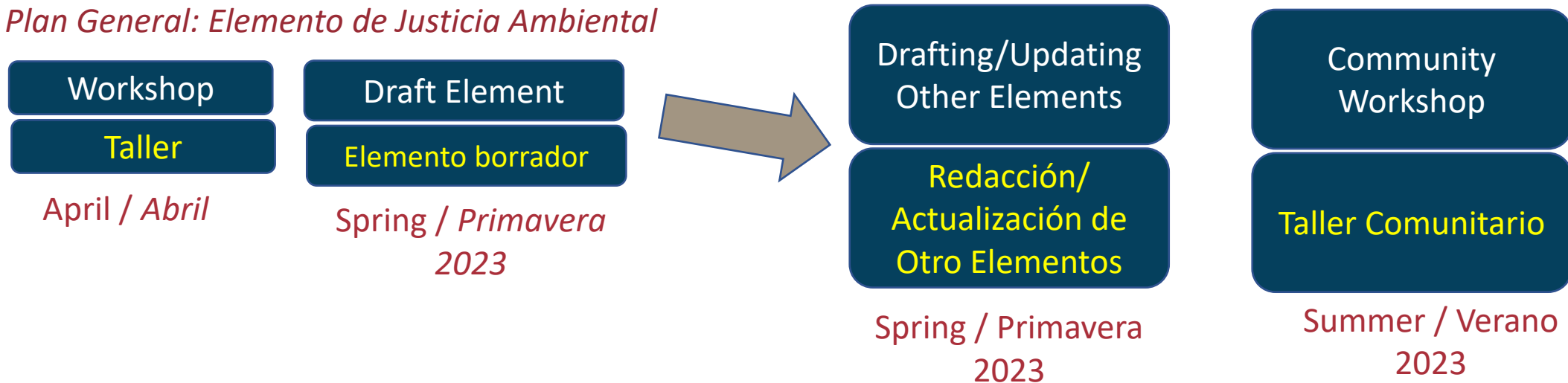
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February 28, 2023







City of Commerce Housing Element Update Survey

The City of Commerce needs your input! As we continue to grow, we must plan for current and future needs of residents by updating our housing policies and designating spaces to accommodate the City's share of regional housing for the 2021-2029 planning period. The Housing Element update helps us develop a variety of goals and policies to support the needs of our growing population, and for this we need to hear from you!

**WITH YOUR HELP WE CAN BETTER IDENTIFY
CURRENT HOUSING CONDITIONS, NEEDS,
AND PRIORITIES!**

TAKE OUR SURVEY

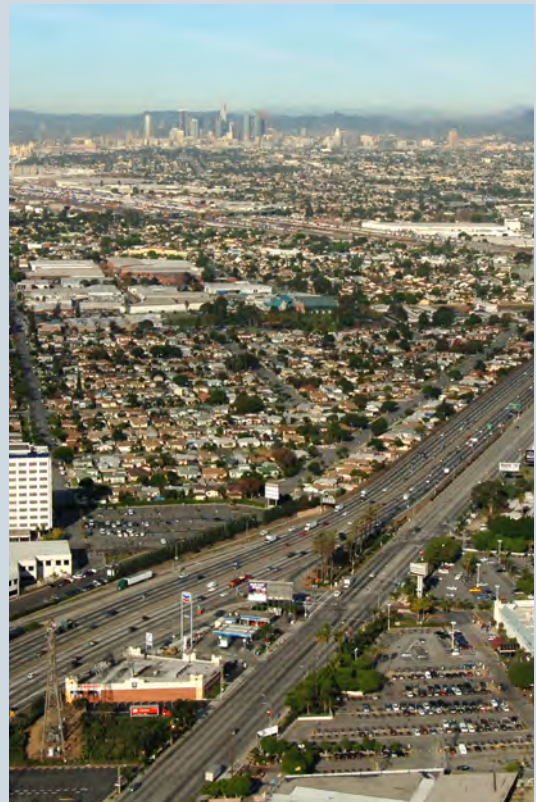
Scan the QR code below:



Or visit:

<https://migsurvey.limequery.com/245166?lang=en>

**Available from November 17, 2022 to
December 15, 2022**





Ciudad de Commerce

Actualización del elemento de vivienda

Encuesta

¡La Ciudad de Commerce necesita su opinión! A medida que continuamos creciendo, debemos planificar las necesidades actuales y futuras de los residentes actualizando nuestras políticas de vivienda y designando espacios para acomodar la parte de viviendas regionales de la Ciudad para el período de planificación 2021-2029. La actualización del Elemento de Vivienda nos ayuda a desarrollar una variedad de objetivos y políticas para apoyar las necesidades de nuestra creciente población, ¡y para esto necesitamos escuchar de usted!

**¡CON SU AYUDA PODEMOS IDENTIFICAR
MEJOR LAS CONDICIONES, NECESIDADES Y
PRIORIDADES ACTUALES DE VIVIENDA!**

TOMA NUESTRA ENCUESTA

Escanea el código QR a continuación:



O visita:

<https://migsurvey.limequery.com/245166?lang=es>

**Disponible del 17 de noviembre de 2022 al
15 de diciembre de 2022**





Housing Element Update Survey Results Summary

Prepared by:



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March 13, 2023

Introduction:

California cities are required to adopt a General Plan. A General Plan establishes the framework for decision making in the community. As required by State law, the City of Commerce is updating one of its General Plan's elements – Housing. The Housing Element identifies how Commerce can meet existing and future housing needs for all income levels of its population. Community input is critical to ensure community needs, values, and preferences are reflected. Woven throughout the Element's update is a comprehensive community engagement plan that will be used to inform the plan update process.

This Housing Element community survey solicited public input regarding the current state of housing, as well as any housing-related issues facing Commerce and its residents. The survey responses and results are summarized below.

The City's website contains more information about the General Plan update and upcoming activities. <https://www.reimaginecommerce.com/>

Methodology:

The City is conducting a variety of outreach activities to solicit community input. The Housing Element survey being one of the outreach methods. The survey was made available from November 17, 2022 to December 15, 2022. The survey was promoted extensively through the City's online and "live" communication channels, including email communications to stakeholders, social media posts, and the City's website.

In total, the City received 11 responses to the survey questions. Of these responses, 3 surveys received complete responses (answers provided for every survey question), the remaining 8 received partial responses (some questions did not receive answers); these partial responses were included in the summary analysis.

Key Findings:

Of the survey respondents, 18% were homeowners living in single-family homes. Respondents said they lived in Commerce due to its proximity to their jobs and their appreciation of the "small-town community feel". When asked why the respondents didn't own a home, the only response said that he/she/they could not afford owning a home. Approximately 18 percent of respondents indicated satisfaction with the current condition of their housing situation. Similarly, 9 percent said they were satisfied by their home's current physical condition, while another 18 percent said they were unsatisfied. Additionally, 27 percent of respondents indicated being unsatisfied with the range and variety of housing options in the Commerce.

When asked what type of housing is most needed in the Commerce, a strong preference for more 'single-family homes' was stated. When asked what the most important housing challenge is, four concerns were prioritized:

- Prioritize housing affordability for children growing up in Commerce, who wish to remain in the city when they become adults.
- Focus on developing new housing near commercial locations, further establishing 'live/work' neighborhoods.

- Consider existing housing rehabilitation.
- Establish mortgage loan programs and create support programs which aid homeowners at risk of mortgage default.

When asked where new housing should be located, respondents indicated the City should consider locating housing along major streets (such as Washington Boulevard and Atlantic Boulevard), as well as new the future Montebello/Commerce station, or near existing and planned public transit.

Responses:

Housing:

1. Currently, do you...

- 33.3% live in Commerce
- 33.3% live and work in Commerce
- 33.3% work in Commerce
- 0% do not live or work in Commerce

Respondents: 3

2. Which best describes your current living situation?

- 100% live in a single-family home
- 0% live in a duplex/triplex/fourplex
- 0% live in condominium/townhome
- 0% live in an apartment
- 0% live in an accessory dwelling unit (granny flat/guest house)
- 0% live in a mobile home
- 0% live in a group home/assisted living
- 0% live in interim/transitional housing and shelter
- 0% do not currently have a permanent home
- 0% specified "no answer"

Respondents: 3

3. Which best describes your current housing situation?

- 33.3% live in a home they rent
- 33.3% live in a home they own
- 0% live with friends/family, do not own or pay rent
- 0% do not currently have a permanent home
- 9.09% specified "no answer"

Respondents: 3

4. If you rent, what prohibits you from owning your home?

- 0% anticipate moving to another city in the near future
- 0% prefer to rent
- 33.3% cannot afford the down payment or mortgage
- 0% stated job instability
- 66.7% specified “no answer”

Respondents: 3

5. If you live in Commerce, why have you chosen to live here? Mark all that apply.

- 33.3% said proximity to job
- 0% said to proximity to family and/or friends
- 33.3% said they like the small-town community feel
- 0% said they grew up in Commerce
- 0% said affordability
- 33.3% specified “no answer”

Respondents: 3

6. Are you satisfied with your current housing situation?

- 66.7% said yes
- 33.3% said no
- 0% said no opinion

Respondents: 3

7. Are you satisfied with the physical condition of your home?

- 33.3% said yes
- 66.7% said no
- 0% had no opinion

Respondents: 3

8. Are you satisfied with the range and variety of housing options in Commerce

- 0% said yes
- 100% said no
- 0% had no opinion

Respondents: 3

9. What types of housing does Commerce need most? Respondents ranked their top 3 choices in order of importance, with 1 being the most important.

[illegible]

10. Indicate the importance of current housing challenges in Commerce? Respondents ranked their top choices in order of importance, with 1 being the most important.

	Housing Challenges in Commerce					Total Points
	Very Important	Somewhat Important	Not Important	Don't Know	No Answer	
Ensure that children who grow up in Commerce can afford to live in Commerce on their own as adults	2	1				3
Focus new housing near commercial locations, creating "live/work" neighborhoods.	3					3
Streamline the process for new housing construction.	1	1				2
Establish housing for seniors, large families, veterans, and/or persons with disabilities.		2				2
Provide shelters and transitional housing for homeless families and individuals, together along with services that help move people into permanent housing	2					2
Encourage the rehabilitation of existing housing in older neighborhoods.	2	1				3
Support programs to help homeowners at risk of mortgage default to keep their homes, including mortgage loan programs	2	1				3
Targeted efforts to address long-term inequities in the housing market, including discrimination in renting	1	1				2

11. Indicate the best location for new housing in Commerce. Respondents ranked their top two choices in order of importance, with 1 being the most important.

	1	2	Total
Along major streets (such as Washington Boulevard and Atlantic Boulevard)	1	2	3
Near the future Montebello/Commerce Station	2	1	3
In existing multi-family neighborhoods	0	0	0
In existing single-family neighborhoods	0	0	0
Scattered throughout Commerce	0	0	0

12. Indicate the best approach to provide more housing in Commerce. Respondents ranked their top two choices in order of importance, with 1 being the most important.

	1	2	Total
New housing should be concentrated near existing and planned public transit	1	2	3
New housing should blend in with the character of surrounding neighborhoods.	0	0	0
New housing should be spread evenly across all parts of the city	0	0	0
New housing should be located where it will have the least impact on traffic in Commerce	0	0	0
New housing should be located with easy access to shops, services, and community facilities.	2	0	2
New housing should be located away from truck routes and industry	0	0	0

13. What else would you like the City to consider when updating Commerce's Housing Element? (write in response)

- "Incorporating mixed-use housing developments is important, because Commerce is in need of additional restaurants, markets and recreational amenities like communal public spaces and perhaps a movie house or Performing Arts center."

14. How long have you lived in Commerce?

- 33.3% have lived in Commerce for 21+ years.
- 33.3% have lived in Commerce 11-20 years
- 33.3% do not live in Commerce.

Respondents: 3

15. Please indicate your gender.

- 66.7% indicated 'Female'
- 33.3% indicated 'Male'

Respondents: 3

16. How do you identify yourself? (select all that apply)

- 100% identified as Hispanic/Latino

Respondents: 3

17. What language is primarily spoken in your household?

- 100% indicated English

Respondents: 3

18. What is your age group?

- 66.7% are between ages 30-49
- 33.3% are between ages 50-64

Respondents: 3

19. Which zip code do you reside in?

- 66.7% reside in zip code 90040
- 33.3% indicated 'Other'

Respondents: 3

20. Which best describes your annual household income?

- 33.3% indicated between \$50,000 - \$74,999
- 33.3 % indicated between \$75,000 - \$99,999
- 33.3% preferred not to say

Respondents: 3

21. Do you have children in the house under the age of 18?

- 66.7% indicated 'Yes'
- 33.3% indicated 'No'

Respondents: 3

APPENDIX B: REVIEW OF 2014 HOUSING ELEMENT

Overview

Under State Housing Element law, communities are required to assess the achievements under their adopted housing programs as part of the periodic update to their housing elements. These results should be quantified where possible (e.g., the number of units rehabilitated), but may be qualitative where necessary (e.g., mitigation of governmental constraints). The results should then be compared with what was projected or planned in the earlier element. Where significant shortfalls exist between what was planned and what was achieved, the reasons for such differences must be discussed.

The City of Commerce 2014-2021 Housing Element set forth a series of housing programs with related goals for the following areas:

- Conservation of the City's Existing Housing Stock
- Increase Affordable Housing Opportunities
- Removal of Constraints to New Housing Construction
- Equal Housing Opportunity
- Identify Adequate Sites to Achieve Housing Variety

This section reviews the City's progress to date in implementing these housing programs and their continued appropriateness for the 2021-2029 Housing Element. **Table B-1** summarizes the City's housing program accomplishments, followed by a review of its quantified objectives (**Table B-6**). The results of this analysis will provide the bases for developing the comprehensive housing program strategy for the 2021-2029 Element.

Cumulative Impacts on Addressing Housing for Special Needs

The City addressed housing needs of special populations through the following include:

- Neighborhood Fix Up Grant and CDBG Home Preservation Grant programs which benefit many senior homeowners.
- Modelo Specific Plan that provides a mix of unit sizes, especially larger homes for multigenerational living.

As part of the 2021-2029 Housing Element update, the City will explore other actions to expand housing opportunities for special needs populations.

Table B-1: Evaluation of 2014-2021 Housing Element Programs

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 1.1 - Code Enforcement Program. The objective of the City's Code Enforcement Program is to bring substandard housing units into compliance with City codes. Potential code violations are identified based on exterior windshield surveys and complaints reported to the City.	To maintain and improve the condition of the City's existing housing stock and promote the use of established City programs for rehabilitation and revitalization of housing units in the City. Corrections will be addressed on a case by case basis.	The City currently conducts windshield surveys and addresses complaints on an ongoing basis. Throughout the planning period the City addressed 3,200 violations including: 292 violations in 2014, 421 violations in 2015, 522 in 2016, 386 in 2017, 206 in 2018, 205 in 2019, 717 in 2020 and 449 in 2021. This is an average of 400 violations addressed per year. When appropriate code enforcement officers referred residents to the Substantial Housing Rehabilitation Loan Program, CDBG Home Preservation Grant Program, Neighborhood Fix Up Grant Program, and the Environmental Rehabilitation Program. Between 2014 and 2021, approximately 37 property owners with code enforcement cases were assisted through the City's Home Preservation Grant or Neighborhood Fix-Up Grant Programs.	This program is continued in the 2021-2029 Housing Element.

Table B-1: Evaluation of 2014-2021 Housing Element Programs

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Program 1.2 – Substantial Housing Rehabilitation Loan Program. The program provides deferred loans of up to \$100,000 for the rehabilitation of owner-occupied single-family homes.</p> <p>The elimination of the Commerce Community Development Commission resulted in the loss of a permanent funding source for this program.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City's website and in other public places to encourage residents to utilize the program.</p>	<p>On an annual basis the City administers loans between \$50,000 and \$100,000 to substantially rehabilitate units and in return property owners are required to put affordability covenants in place. During the planning period the City was able to achieve their objectives and assist 3 households with substantial rehabilitation loans. The units assisted were rehabilitated and affordability covenants put in place to preserve the units as affordable to low income households for 45 years. Units that utilized \$100,000 loans will be counted as "substantial rehab" project units towards the City's required housing allocation consistent with HCD requirements.</p>	<p>Due to limited funding, program was discontinued. No funding has been found for this program.</p>

Table B-1: Evaluation of 2014-2021 Housing Element Programs

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Program 1.3 – Environmental Rehabilitation Program. The Environmental Rehabilitation Program will provide grant assistance up to \$30,000 to address the negative air quality and noise impacts created by the operation of the rail road yards and freeways within the City. This program targets those households with very low- or low-incomes.</p> <p>This program was historically funded by the Redevelopment Agency Low and Moderate Income Housing Fund (“Housing Set-Aside Funds”), however the elimination of the Commerce Community Development Commission in the previous planning period, resulted in the loss of a permanent funding source for this program.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to encourage residents to utilize the program.</p>	<p>No funding was identified for this program.</p>	<p>This program is removed from the 2021-2029 Housing Element.</p>
<p>Program 1.4 - Neighborhood Fix Up Grant Program. The Neighborhood Fix Up Grant Program provides up to \$1,000 for housing repairs and alterations that are visible from the street.</p> <p>This program was historically funded by the Low and Moderate Income Housing Fund (“Housing Set-Aside Funds”), however the elimination of the Commerce Community Development Commission in the previous planning period, resulted in the loss of a permanent funding source for this program</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City’s website and in other public places to encourage residents to utilize the program.</p>	<p>Funded through Measure AA, the Neighborhood Fix-Up Grant Program provided financial assistance to residents for minor improvements to their homes. The Program provided funding for the cost of materials associated with eligible home exterior upgrades that are visible from the street or public right-of-way. Between 2014 and 2021, approximately 96 homes were assisted through the Neighborhood Fix-Up Grant Program.</p>	<p>This program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>

Table B-1: Evaluation of 2014-2021 Housing Element Programs

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 1.5 – CDBG Home Preservation Grant Program. The CDBG Home Preservation Grant Program provides up to \$25,000 to qualified applicants to complete improvements to their residence. The Program addresses substandard housing conditions promotes property maintenance by providing residential rehabilitation grants to qualified low- and moderate-income residents living in single-family owner-occupied dwellings	Provide \$60,000 in available funding to assist approximately 3 households annually.	<p>From 2014 through 2021, a total of \$1,083,507 was allocated for the City's Home Preservation Grant Program. During that time, the City assisted between 3 to 6 households annually.</p> <p>The City's website includes information on the grant program's guidelines as well as an interest form for residents to fill out and submit to the Economic Development and Planning Department.</p>	This program continues to be appropriate and is included in the 2021-2029 Housing Element.

Table B-1: Evaluation of 2014-2021 Housing Element Programs

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 1.6 - Monitor and Preserve Affordable Housing. The City will inventory and gather information to establish an early warning system for publicly assisted housing projects that have the potential to convert to market rate.	<p>Maintain their AB 987 database to include detailed information on all subsidized units, including those that have affordability covenants. The database will indicate the expiration date of any covenant and any requirements governing reimbursement.</p> <p>The City will also continue to monitor at-risk developments throughout the planning period. Once the City receives notice of a potential conversion of the federally assisted units, the Housing Division will contact the owners to ascertain what will be required to extend the participation of these projects in the HUD 221 program.</p> <p>The City will strive to maintain all existing affordable rental units by monitoring their affordability and contacting property owners to discuss options for long term affordability.</p>	The City maintains a number of affordable units through existing deed restrictions. No rental units were at-risk of conversion to market rate during the planning period. An inventory of affordable units will be kept up-to-date by Staff to monitor affordable units throughout the planning period and update the list with new deed restricted properties that are developed during the planning period.	This program continues to be appropriate and is updated and included in the 2021-2029 Housing Element.

Table B-1: Evaluation of 2014-2021 Housing Element Programs

Goal 1: Conserve and enhance the quality of existing housing and residential neighborhoods in Commerce.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 1.7 – Energy Efficient Design. The City will review ordinances and recommend changes where necessary to encourage energy efficient housing design and practices that are consistent with state regulations.	The Housing Division will advertise the appropriate information related to this program on the City's website . In addition, the Planning Division and code enforcement personnel will refer potential applicants to the Housing Rehabilitation Program or the Neighborhood Fix-up Grant Program as potential funding sources.	The City currently provides information on energy efficiency programs on their website and at City Hall. When appropriate, City Staff and code enforcement officers, direct residents to apply for applicable programs. Additionally, the City encourages all new development to be energy efficient and to take into consideration LEED standards.	Implementation of the Building Code energy efficiency requirements is not included in the 2021-2029 Housing Element as a housing program.

Table B-2: Evaluation of 2014-2021 Housing Element Programs

Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Program 2.1 – First Time Homebuyer Program. This Program was intended to operate in conjunction with the Substantial Housing Rehabilitation Loan, by providing residents the opportunity to apply for assistance to purchase homes acquired and rehabilitated by the City. Residents were also allowed to identify a non-City owned residence and apply for rehabilitation and financial assistance. To further homeownership opportunities the City of Commerce also partners with the Los Angeles County Housing Authority to assist Commerce residents currently on the County's Section 8 waitlist.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City's website and in other public places to encourage residents to utilize the program.</p>	<p>The City offered first-time homebuyer assistance to nine households in conjunction with the Rosewood Village project. Up to \$150,000 in secondary financing was offered to nine first-time homebuyers. Application deadline was May 2022. The Modelo Specific Plan also commits to providing 85 units as housing affordable to middle income households.</p>	<p>This program is updated and included in the 2021-2029 Housing Element.</p>
<p>Program 2.2 - (Senior and Handicapped) Rent Subsidy Program. The program provides subsidies to eligible households with residents that are at least 57 years of age or are physically handicapped. The prospective applicant must also qualify as low- or very low-income. The maximum monthly subsidy for a qualified household is \$200.</p> <p>The City previously utilized redevelopment set-aside monies to provide rent vouchers to seniors and handicapped residents. With the dissolution of the Commerce Community Development Commission, the City has allocated money from their General Fund to continue the program, but has reduced and limited the number of recipients.</p>	<p>Investigate new funding opportunities and administer funds as they become available. If and when a permanent funding source is identified, the City will provide information at City Hall, on the City's website and in other public places to increase awareness and solicit additional applications.</p>	<p>The City did not find a permanent funding source for this program.</p>	<p>Funding for rent subsidies is limited. This program is not included in the 2021-2029 Housing Element.</p>

Table B-2: Evaluation of 2014-2021 Housing Element Programs

Goal 2: Provide a variety of housing types to accommodate all economic segments of the community.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 2.3 – Los Angeles County Partnership. As a means of further leveraging housing assistance, the City will cooperate with the Los Angeles County Community Development Commission (CDC) and Los Angeles County Housing Authority to promote resident awareness and application for County run housing assistance programs.	Increase resident awareness about housing programs offered by the County by providing information at City Hall, on the City's website and in other public places to increase awareness	The City continues to participate in programs available through LACDA.	This program is updated in the 2021-2029 Housing Element.

Table B-3: Evaluation of 2014-2021 Housing Element Programs

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Program 3.1 – Housing Opportunity Overlay Program. During the 2008-2014 planning period, the City established a new Housing Opportunity Overlay in the 2020 General Plan to facilitate the transition of existing non-residential uses to new residential development.</p> <p>To finalize the creation of the overlay, the City has established the development process required to implement the overlay area, including the creation of development standards and design guidelines. In developing the guidelines and standards the City plans to ensure that the development of high density, multifamily, affordable housing is allowed and encouraged.</p>	<p>Facilitate the redevelopment of underutilized sites by identifying housing opportunity sites. Approach land owners and business operators in the overlay area to discuss the future transition of uses. Provide information to interested developers about potential residential opportunity sites.</p>	<p>The Rosewood Village program provides 133 units through the Housing Opportunity Overlay program.</p>	<p>With the General Plan update, the City has identified appropriate locations for facilitating housing development in the future through various mixed use designations. The Overlay is no longer needed to facilitate the transition of industrial uses to housing.</p>

Table B-3: Evaluation of 2014-2021 Housing Element Programs

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 3.2 - Atlantic Blvd. Housing Program. In the 2020 General Plan, a Mixed-Use designation along the Atlantic Boulevard corridor between the Mixmaster (on the north) and Washington Boulevard (on the south) was created. This land use designation provides for both residential development and commercial development.	<p>The City will develop standards and design guidelines for the Mixed Use Overlay in the City's Zoning Ordinance. The City will maintain an inventory of opportunity sites along Atlantic Boulevard and provide information about development opportunities and the development standards established for the overlay.</p> <p>The City will contact developers in the area to inform them of opportunity sites, the established development standards, and other pertinent information. The City may also publish information online and at City Hall about the Atlantic Boulevard Housing Program.</p>	The City is updating its General Plan. Design guidelines will be included as part of the General Plan and Zoning Ordinance update.	This is included in the 2021-2029 Housing Element, as part of the General Plan update.

Table B-3: Evaluation of 2014-2021 Housing Element Programs

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 3.3 - Lot Consolidation Program. Parcels located in specific areas of the City within the Housing Opportunity overlay and along Atlantic Boulevard tend to be narrow and shallow in size, which can act as a constraint to the development of larger housing projects. To encourage the development of higher density residential and mixed-use projects on vacant and underutilized sites, the City offers incentives to encourage lot consolidation.	The City will notify housing developers of development incentives and opportunities for lot consolidation.	The City has provided info about lot consolidation to promote Housing Overlay.	This program is included in the 2021-2029 Housing Element.
Program 3.4 - Density Bonus Program The City will evaluate its density bonus provisions as part of the Zoning Ordinance revisions that will be required to implement the General Plan. In the event it is not in conformance with current State requirements, the Density Bonus section of the City's Zoning Ordinance will be revised.	To increase the number of affordable units throughout the City in new housing developments. The Density Bonus will be emphasized in future development within the Housing Opportunity Overlay Areas.	While the City has not updated its Density Bonus Ordinance since 2014, the City continues to offer density bonus for lower and moderate income housing consistent with State law. Modelo and Rosewood Village both utilized specific plan as a tool for development. Middle income housing units (up to 175 AMI) are made available through development agreement.	This program is included in the 2021-2029 Housing Element as part of the Zoning Ordinance amendments.

Table B-3: Evaluation of 2014-2021 Housing Element Programs

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 3.5 - Streamlined Processing. The City continues to monitor permit processing times to ensure the fastest possible turnaround for applications and identify any impediments to affordable housing. Additionally, the processing time of applications for new construction or rehabilitation of housing for lower and moderate-income households and seniors will be prioritized.	Continue to monitor permit processing times and investigate ways to streamline the process. Prioritize the review of projects that include affordable housing units.	The City continues to prioritize processing for affordable and senior housing. Also the creation of new mixed use zones will eliminate the requirement to pursue residential and mixed use developments through the Housing Opportunity Overlay.	This program is included in the 2021-2029 Housing Element.
Program 3.6 – Incentives for Large Multi-Family Units. Review the Zoning Ordinance to determine what incentives and/or regulations can be implemented as a means to promote the development of rental housing with three or more bedrooms. As part of the Housing Opportunity Overlay the City has also included development standards to encourage and facilitate an increased number of larger units. The requirements for mixed-use housing are applicable to both rental and owner occupied housing.	To increase the number of affordable multi-bedroom units to accommodate larger low-income families	The City facilitates multigeneration housing. The Modelo Specific Plan offers a range of unit sizes.	This program is included in the 2021-2029 Housing Element.

Table B-3: Evaluation of 2014-2021 Housing Element Programs

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Program 3.7 – Residential Development Standards Review the development standards for the R-1, R-2, and R-3 zones to identify standards that may constrain the development of affordable housing and housing for disabled individuals. Specifically, Staff will review requirements such as the minimum unit size, property line setbacks, parking requirements, height restrictions, etc. to ensure that they are necessary and pertinent.</p>	Review development standards to identify constraints and remove or offset constraints where possible.	Much of the future residential growth is expected to occur within the new mixed use designations proposed by the General Plan update. The Zoning Ordinance update will establish appropriate development standards to facilitate multi-family and mixed use development in these new designations.	This program is incorporated with the Adequate Sites for RHNA program in the 2021-2029 Housing Element.
<p>Program 3.8 – Accessory Dwelling Unit (Second Unit) Ordinance. Ensure that the second unit ordinance complies with State law and promote the ordinance to homeowners and property managers.</p> <p>Encourage residents that have illegally constructed a second unit on their property to bring existing illegal units into compliance with City zoning and building codes. The City may recommend that homeowners apply for assistance through existing rehabilitation programs.</p>	Encourage the construction of 5 units over the planning period. To facilitate use of the ordinance the City will provide informational materials about the second unit ordinance at City Hall, on the City's website and in other public places to increase awareness.	During the planning period, five accessory dwelling units were permitted.	This program is expanded in the 2021-2029 Housing Element.

Table B-3: Evaluation of 2014-2021 Housing Element Programs

Goal 3: Minimize the impact of governmental constraints on housing production and affordability.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 3.9– Off Site Improvements. Provide opportunities for public, private and non-profit groups to develop affordable housing by constructing off-site improvements and physical infrastructure as Capital Improvement Projects.	Facilitate easier development of affordable housing by allowing improvements to be negotiated.	The City continues to offer off-site improvements on a case-by-case basis to facilitate affordable housing.	This program is included in the 2021-2029 Housing Element.
Program 3.10 – Water and Sewer Service Providers. Ensure compliance with Government Code Section 65589.7- the City must deliver a copy of the 2014-2021 Housing Element to all public agencies or private entities that provide water or sewer services to properties within the City of Commerce.	Ensure that water and sewer providers are aware of the City's intentions for residential development throughout the City.	A copy of the 2014-2021 Housing Element was delivered to all water and sewer providers. An EIR was prepared for the Modelo residential project and the Rosewood Village project. These EIRs included analysis of water and sewer capacity for the residential units.	This program is included in the 2021-2029 Housing Element.
Program 3.11 - Flood Management Continue to utilize information from the General Plan and consider flood risks in all future land use decisions.	Ensure that flood risks are considered when making land use decisions.	Review of flood risks is part of the planning and development engineering review process for residential projects.	This is not a housing program and is not included in the 2021-2029 Housing Element.

Table B-4: Evaluation of 2014-2021 Housing Element Programs

Goal 4: Promote equal housing opportunity for all residents.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 4.1 – Reasonable Accommodation Program for Disabled. Ensure that sufficient provisions are in place by the City to facilitate a resident's request for "reasonable accommodation."	Administer City operated programs to assist disabled households with architectural modifications to their homes and continue to implement the provisions of the Americans with Disabilities Act (ADA). Provide information in public places regarding the City's reasonable accommodation ordinance and make information on this program more widely available to residents. Referrals will be made whenever possible.	The City continues to offer reasonable accommodation to facilitate housing for persons with disabilities.	The City will remove subjective condition for reasonable accommodation approval. This is included in the Zoning Ordinance Amendments program.
Program 4.2 – Fair Housing Program. The City will continue to contract with the Housing Rights Center to provide residents with fair housing services using Community Development Block Grant (CDBG) funds.	Comply with all State and federal fair housing requirements when implementing housing programs or delivering housing-related services.	The City assisted in program outreach through placement of fair housing program brochures in both English and Spanish at the public counter, City library, post office, and other community locations such as the City's senior center.	The fair housing program is expanded in the 2021-2029 Housing Element to comply with AB 686 (Affirmatively Furthering Fair Housing).

Table B-4: Evaluation of 2014-2021 Housing Element Programs

Goal 4: Promote equal housing opportunity for all residents.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Action 4.3 – Housing for Developmentally Disabled Persons Program. To accommodate residents with developmental disabilities the City will seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities.</p> <p>Provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals, to projects targeted for persons with disabilities, including persons with developmental disabilities</p> <p>Reach out annually to developers of supportive housing to encourage development of projects targeted for special needs groups.</p> <p>Finally, as housing is developed or identified, Commerce will work with the Eastern Los Angeles Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities.</p>	<p>The City will continue to offer specific regulatory incentives throughout the planning period, when funding is available, apply for funding at least twice during the planning period to encourage development of unit specifically for persons with disabilities, will reach out annually to developers, and will initiate a cooperative outreach program with the Regional Center by 2014.</p>	<p>The city provides priority processing, reasonable accommodation, and potential funding/infrastructure improvements to support housing for lower and moderate income households and households with special needs, including persons with disabilities.</p>	<p>This is not included as a separate program in the 2021-2029 Housing Element.</p>

Table B-5: Evaluation of 2014-2021 Housing Element Programs

Goal 5: Identify adequate sites to achieve housing variety.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
<p>Program 5.1 – Ensure Adequate Sites to Accommodate the RHNA. To ensure sufficient residential capacity to accommodate the identified regional need for lower-income households is maintained within the Housing Opportunity Overlay, the City will develop and implement a formal monitoring.</p> <p>The program will track development approvals on identified sites and for those that result in a reduction of potential affordable units below the residential capacity assumed in Table 6-6, the City will identify and designate additional sites to rezone to ensure that no net loss occurs.</p>	<p>Continue to provide appropriate land use designations and maintain an inventory of suitable sites for residential development. Make the vacant and underutilized residential sites inventory available to non-profit and for-profit housing developers on the City's website whenever possible.</p>	<p>The City was able to facilitate the development of a significant number of new units through Rosewood Village and Modelo specific plans.</p>	<p>This program is updated to reflect the City's new RHNA in the 2021-2029 Housing Element.</p>
<p>Program 5.2 – Extremely Low-Income and Special Needs Housing. Ensure that the Zoning Code is updated to be consistent with SB2 provisions and implemented concurrent with Housing Element adoption.</p> <p>Assist in the development of housing to meet the needs of extremely low-, very low- and low-income households.</p> <p>The City prioritizes funding opportunities to ensure that extremely low- and very low-income housing are given precedence and are able to easily access the financial and regulatory incentives offered by the City.</p>	<p>Monitor available sites for the development of emergency, transitional and supportive housing.</p>	<p>The City created affordable housing for its workforce through the Rosewood Village and Modelo specific plans.</p>	<p>The City will continue to facilitate lower income and special needs housing. This program is included in the 2021-2029 Housing Element.</p>

Table B-5: Evaluation of 2014-2021 Housing Element Programs

Goal 5: Identify adequate sites to achieve housing variety.			
Description of Previous Housing Element Program	Objective	Progress and Effectiveness	Appropriateness
Program 5.3 – Alternative Housing Models. Encourage through development incentives the provision of more innovative housing types that may be suitable for the community, including community care facilities, supportive housing, and assisted living for seniors	Facilitate the development of alternative housing models suited to the community housing needs through the provision of flexible zoning regulations. Continue to provide appropriate standards to encourage development of senior housing to meet the needs of the City's growing senior population.	The City continues to encourage a variety of housing in the community. The General Plan update offers increased opportunities for multi-family and mixed use housing.	This program is included in the 2021-2029 Housing Element.

Table B-6: Summary of RHNA Progress (2014-2021)

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Subtotal Affordable Units	Above Moderate Income	Total
Accessory Dwelling Units	0	0	0	0	0	5	5
Attached Townhomes (Rosewood Village)	0	0	0	0	0	31	31
Total Units	0	0	0	0	0	36	36
Regional Fair Share Housing Need 2014-2021	6	6	7	7	26	20	46
Percent of RHNA Met	0%	0%	0%	0%	0%	180%	78%

APPENDIX C: SITES INVENTORY

METHODOLOGY

In developing the sites inventory for the City of Commerce, we used a multi-tier approach to identify parcels or “sites” with the best potential for development/redevelopment over the next eight years.

Strategies for Meeting RHNA

The following are factors considered in parcel selection for the sites inventory:

1. Approved units in Modelo Specific Plan;
2. City-owned properties that have been identified for future residential development;
3. Non-City-owned vacant sites and parking lots;
4. Non-City-owned nonvacant sites that met at least three of the following factors:
 - a. Owned by the same owner that will facilitate lot consolidation,
 - b. Existing uses that are similar types of uses being recycled in Commerce and surrounding cities;
 - c. Building age is at least 30 years or building is vacated. Buildings older than 30 years often require significant improvements to update the systems and difficult to meet ADA requirements as warranted with substantial rehabilitation;
 - d. Existing Floor Area Ratio (FAR) that is less than 0.50;
 - e. Improvement to Land Ratio (ILR) of less than 1.0, indicating the land is worth more than the structures on site. However exceptions to the rule are sites with large structures such as older shopping centers, office buildings, motels, and warehouses. Often these high improvement values may serve as financial liability to property owners if the uses are not generating adequate revenues but are still subject to high property taxes.
 - f. Property is in obvious condition of deferred maintenance.

Recent Development Trends

In selecting sites appropriate for development or redevelopment over the sixth cycle Housing Element, the City reviewed recent projects in the City and surrounding communities (Table C-1). For density assumptions in the site inventory, the proposed density ranges in the General Plan Update (Land Use Element) were considered. The proposed R2 land use designation will change from 0 to 17 du/ac to 11.1 to 17 du/ac and the R3 land use designation will change from 0 to 27 du/ac to 17.1 to 27 du/ac. Given these alterations, the lower range of these ranges were assumed: 12 du/ac in the medium density residential zone and 20 du/ac in the high density residential zone. The proposed densities for the General Plan Update new land use categories are 40 to 80 du/ac. Based on recent projects, a conservative assumption of 50 du/ac for mixed use zones was applied. For the affordability break down, assumptions included 50 percent lower income, 25 percent moderate income and 25 percent above moderate income for sites that are city-owned.

Table C-1: Recent Development Trends in Commerce and Neighboring Cities

Address	City	Year Approved/ Constructed	Acres	Previous Use	Proposed/Approved Use and Zone	Density
Townhomes						
5625 Jillson Street (Rosewood Village - Site 1B)	Commerce	2020/ 2021	1.33	19,629 sq. ft. (1 1/2 stories) light industrial, warehouse and office bldg. Built in 1949	Attached single family homes/townhomes	23.3
5550 Harbor Blvd (Rosewood Village Site 1A)	Commerce	2020/ Building Permit Review	1.98	27,376 sq. ft. office building (1 1/2 stories), parking lot for Aquatic Center. Built in 1956	Attached single family homes	18.6
5555 Jillson Street (Rosewood Village Site 2)	Commerce	2020/ Waiting for Plan Check Submittal	2.43	City of Commerce Transportation Center office building, maintenance bays and 2-story parking structure. Built in 1997	Attached single family homes	26.7
Less 1/2 acre						
5953 Florence Ave	Bell Gardens	Plan check	0.27	Vacant parking lot	4 Condos (Above Mod)	14.8
1018 W. Olympic Ave	Montebello	Pipeline Project	0.40	Parking lot	24 units (8 moderate) C-2 zone (changing to Mixed Use)	60
2000 Flotilla St	Montebello	Pipeline Project	0.49	Parking lot	25 units (Very Low) Industrial zone (changing to res)	51
Over 1/2 acre						
8000 Bell Gardens	Bell Gardens	Entitled	2.17	Vacant lot - R3 zone	48 Condos (Above Mod)	22.1
6231 & 6301 Eastern Ave	Bell Gardens	Application Submitted	0.68	Chiropractor office, single-family home, & vacant commercial bldg. Built in 1948 and 1949. FAR = 0.13, ILR = 0.06	16 Condos (Above Mod) & retail	23.5
7940 Telegraph Road	Downey	2016/ Completed	1.60	Parking Lot - C-2/P-B zone (Site rezoned to R-3)	39 units	

2021-2029 Housing Element

Address	City	Year Approved/ Constructed	Acres	Previous Use	Proposed/Approved Use and Zone	Density
8150 Third Street	Downey	2016/ Completed	1.0 (consolidation of 4 lots)	Two lots - single-family homes, two lots were parking lots	28 units in Downtown Res SP	
9553 Firestone Blvd	Downey	2016/ Completed	1.1 (consolidation of 5 lots)	8 (non-conforming) residential uses - C-2/P-B zone	39 units	35.4
116, 128, 129, 133, 136 N. Poplar Ave	Montebello	Entitled	2.00	Residential uses (zoning is being changed to mixed use)	156 units (55 moderate income)	Project A - (140 units at 82 du/ac); Project B - (16 units at 56 du/ac)
112-132 6th St., 501-525 Whittier Blvd.	Montebello	Pipeline project	1.56	Retail, Vacant, Residential	132 (61 very low, 33 low, 13 mod, 25 above mod); Residential zone (changing to mixed use)	84.6

Sources: *City of Bell Gardens Housing Element, adopted July 2022*
City of Downey Housing Element, adopted October 2022
City of Montebello Housing Element; adopted June 2022
City of Commerce Economic Development and Planning Department

Current Zoning and Environmental Conditions in Commerce

The City of Commerce is a built-out city in the heart of Los Angeles County. As shown on Figure C-1, the primary land designations are for commercial and industrial uses. In order to meet the residential demands of the city, Commerce is updating the General Plan to allow for further housing opportunities. Once the General Plan Update is adopted, the Zoning Code will also be updated to ensure consistency.

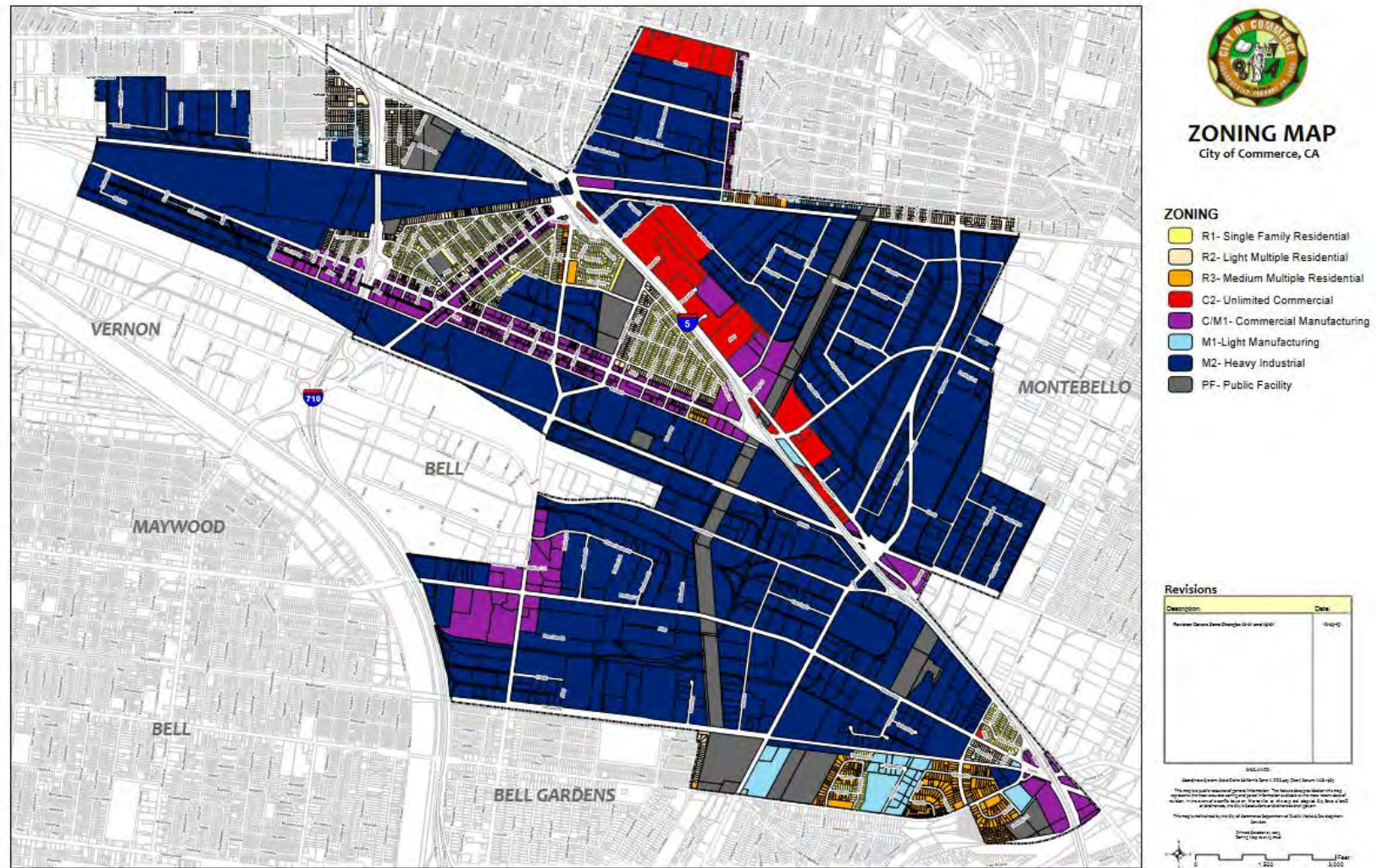
As described in the Housing Resources Chapter of this Element, the City is proposing two mixed-use land use designations that will include residential uses. These are:

- **Mixed Use Atlantic:** this designation will apply to the parcels in the City that are currently in the Atlantic Mixed Use General Plan land use designation along Atlantic Boulevard. The proposed density is 40 to 85 dwelling units per acre.
- **Mixed Use Washington 1:** this designation will allow a variety of uses for parcels located along Washington Boulevard and has a proposed density of 40 to 85 dwelling units per acre.

Many of the proposed sites in the Housing Element inventory are adjacent to or in close proximity to residential uses or public facilities such as parks or city municipal facilities.

The City has also established the Housing Opportunity Overlay (HOO) zone to be applied to discontinued heavy industrial uses.

City of Commerce

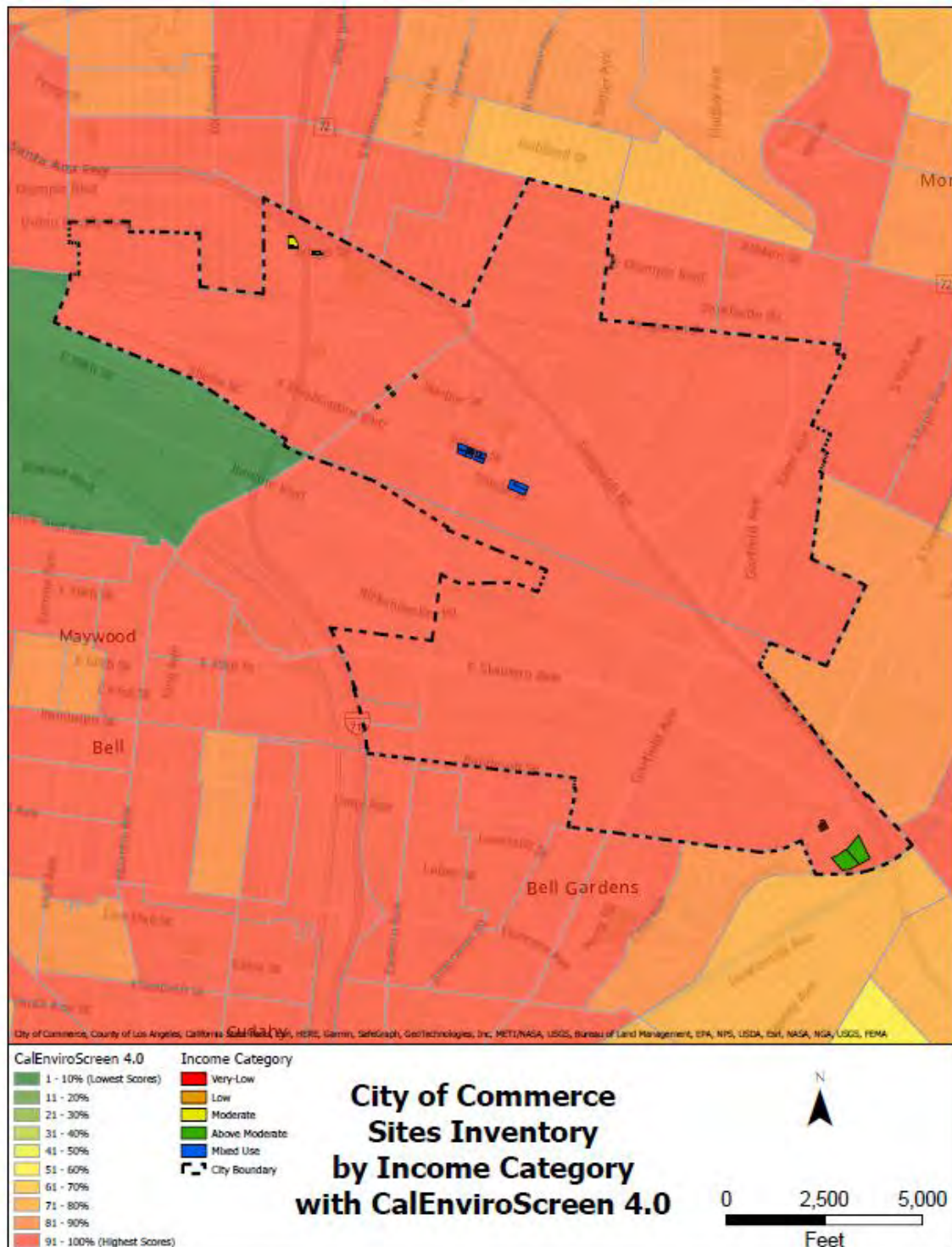


Due to Commerce's location in the Gateway Cities region of Los Angeles County, pollution and other environmental concerns are factors in land use decisions. As described in Appendix D, Affirmatively Furthering Fair Housing, of this Housing Element, the California Office of Environmental Health Hazard Assessment (OEHHA) compiles CalEnviroScreen scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to considering (1) environmental factors such as pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure and (2) sensitive receptors, including seniors, children, persons with asthma, and low birth weight infants, CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. As shown Figure C-2, the CalEnviroScore 4.0 are based on percentiles and show that all tracts in Commerce have the highest (worst) scores for pollution and other environmental hazard exposures. In May 2022, the California Environmental Protection Agency (CalEPA) released maps of communities considered to be disadvantaged communities based on four categories.¹ One of those categories is census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0. All of Commerce is considered a disadvantaged community according to these scores (Figure C-3).

Due to the environmental constraints across the city, the inventory of sites does not put any proposed location at a greater or less disadvantage than others. The City is currently developing an Environmental Justice Element as part of the General Plan. With the gradual recycling of obsolete/discontinued industrial properties into residential and mixed use developments, the City facilitates the remediation of environmental hazards on some of these properties.

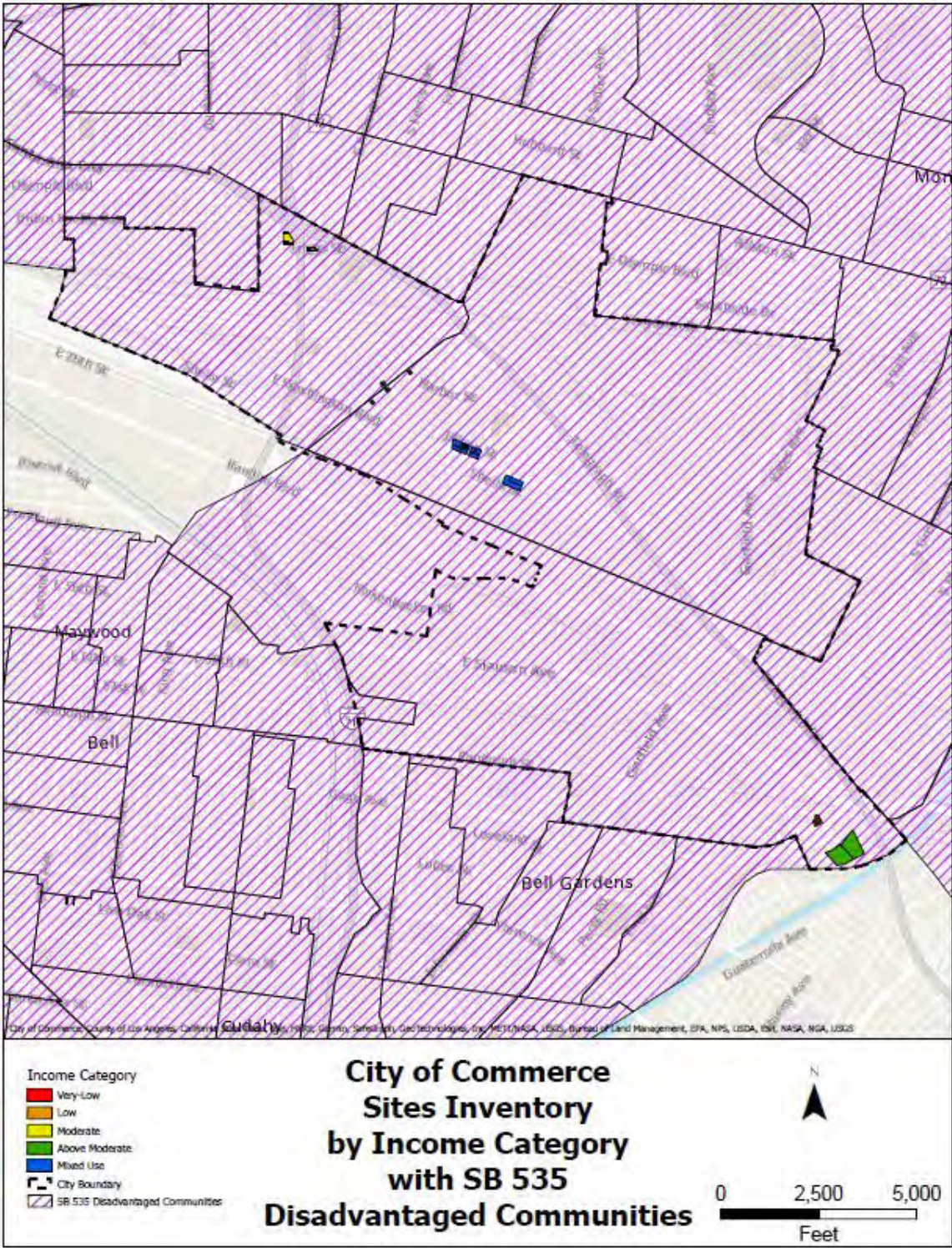
¹ California Office of Environmental Health Hazard Assessment, SB534 Disadvantaged Communities, oehha.ca.gov

Figure C-2: Sites Inventory With CalEnviroScreen



Source: HCD Data Viewer

Figure C-3: Disadvantaged Communities Designation (CalEPA)



Source: HCD Data Viewer

Detailed Sites Inventory

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
City Owned Vacant Sites in Residential Zones															
1338 S Eastern Ave	5241-013-904	0.11	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
1368 S Eastern Ave	5241-013-906	0.12	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
1350 S Eastern Ave	5241-013-908	1.08	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	13	0	0	13	0
1362 S Eastern Ave	5241-013-905	0.12	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
4519 Triggs Street	5241-013-907	0.12	Yes - Site A	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	1	0
Site A		1.55									17	0	0	17	0
7169 Gage Ave	6357-016-908	0.41	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	4	4	0	0	0
Gage Ave/Zindell Ave	6357-016-906	0.18	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	2	2	0	0	0
7165 Gage Ave	6357-016-909	0.15	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	3	0	3	0	0
7155 Gage Ave	6357-016-907	0.16	Yes - Site B	Vacant	HDR	R3 (0-27 du/ac)	No	same	17.1-27 du/ac	20	3	0	3	0	0
Site B		0.9									12	6	6	0	0
Subtotal (A+B)		2.45									29	6	6	17	0
Non-City-Owned Vacant Opportunity Sites in Residential Zones															
Duncan Ave/Triggs Street	5244-002-032	0.08	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	0	1
Duncan Ave/Triggs Street	5244-002-031	0.08	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	0	1
Duncan Ave/Triggs Street	5244-002-033	0.22	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	2	0	0	0	2
1411 S. McBride Ave	5244-002-034	0.07	Yes - Site C	Vacant	MDR	R2 (0-17 du/ac)	No	same	11.1-17 du/ac	12	1	0	0	0	1
Subtotal Site C		0.45									5	0	0	0	5

2021-2029 Housing Element

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
Approved Modelo Specific Plan															
Zindell Ave/Gage Ave	6357-018-900	5.07	Yes - Site D	Public facilities	PF	PF	Yes	Modelo SP	*based on # of units approved in SP	87	425				425
Zindell Ave/Gage Ave	6357-019-904	4.65	Yes - Site D	Public facilities	LDR	PF	Yes	Modelo SP		87	425				425
Subtotal Site D		9.72									850	0	0	0	850
City-Owned Underutilized Sites in Proposed Mixed Use Areas															
5736 Washington Blvd	6334-006-900	0.89	Yes - Site E	Commercial - Veolia Transportation	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	44	11	11	11	11
5733 Sheila St	6334-006-901	1.72	Yes - Site E	Commercial - Veolia Transportation	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	86	21	22	22	21
Site E		2.61									130	32	33	33	32
5611 Washington Blvd	6335-023-900	0.59	Yes - Site F	City Corp Yard	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	29	7	7	7	8
5600 Jillson St	6335-023-901	0.3	Yes - Site F	City Corp Yard - parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	15	4	4	4	3
Jillson St/Daniel Ave	6335-023-902	0.07	Yes - Site F	City Corp Yard - parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	0	1	1	1
Jillson St/Daniel Ave	6335-023-903	0.36	Yes - Site F	City Corp Yard - parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	18	4	4	5	5
Site F		1.32									65	15	16	17	17
2500 Eastern Ave	6335-024-900	0.69	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	34	8	8	9	9
Jillson St/Daniel Ave	6335-024-901	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-902	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-903	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-904	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-905	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1

2021-2029 Housing Element

Address	APN	Acreage	Consolidated Site	Existing Use	GP Designation	Existing Zoning (DU/Acre)	Rezone?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticipated Units	Very-Low	Low	Mod	Above Mod
Jillson St/Daniel Ave	6335-024-906	0.07	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	3	1	0	1	1
Jillson St/Daniel Ave	6335-024-907	0.15	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	7	1	2	2	2
Washington Blvd/Daniel Ave	6335-024-908	0.41	Yes - Site G	Parking lot	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	20	5	5	5	5
5555 Washington Blvd	6335-024-909	0.53	Yes - Site G	Commercial: Jack-in-the-Box	CM	C/M1	Yes	MU Washington 1	40-85 du.ac	50	26	6	6	7	7
Site G		2.2									105	26	21	29	29
Subtotal (E through G)		6.13									300	73	70	79	78
Non-City-Owned Underutilized Opportunity Sites In Proposed Mixed Use Areas															
Atlantic Blvd/Jardine St	5244-024-001	0.13	Yes - Site H	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	6	0	0	0	6
Atlantic Blvd/Jardine St	5244-024-002	0.05	Yes - Site H	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Atlantic Blvd/Jardine St	5244-024-003	0.05	Yes - Site H	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Site H		0.23									10	0	0	0	10
Atlantic Blvd/Jardine St	6335-005-053	0.05	Yes - Site I	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Atlantic Blvd/Jardine St	6335-005-054	0.06	Yes - Site I	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
Atlantic Blvd/Jardine St	6335-005-055	0.12	Yes - Site I	Parking lot	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	6	0	0	0	6
Site I		0.23									10	0	0	0	10
2358 Atlantic Blvd	6335-005-056	0.05	Yes - Site J	Parking lot	Atlantic MU	C/M1	Yes	MU Washington 1	40-85 du.ac	50	2	0	0	0	2
2354 Atlantic Blvd	6335-005-057	0.11	Yes - Site J	Parking lot	Atlantic MU	C/M1	Yes	MU Washington 1	40-85 du.ac	50	5	0	0	0	5
Site J		0.16									7	0	0	0	7

2021-2029 Housing Element

Address	APN	Acreage	Consolidate d Site	Existing Use	GP Designa tion	Existing Zoning (DU/Acre)	Rezone?	Proposed LU Designation	Density Range	Potential DU/Acre	Anticip ated Units	Very- Low	Low	Mod	Above Mod
Atlantic Blvd/Harbor Blvd	6335-003-002	0.05	Yes - Site K	Vacant	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	2	0	0	0	2
2210 Atlantic Blvd	6335-003-003	0.11	Yes - Site K	Office for Water Company?	Atlantic MU	C/M1	Yes	Mixed Use Atlantic	40-85 du.ac	50	5	0	0	0	5
Site K		0.16									7	0	0	0	7
<i>Subtotal (H through K)</i>		<i>0.78</i>									<i>34</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>34</i>
TOTAL		19.53									1218	79	76	96	967

APPENDIX D: AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

Introduction and Overview of AB 686

Assembly Bill 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. AB 686 mandates that local governments identify meaningful goals to address the impacts of systemic issues such as residential segregation, housing cost burden, and unequal educational or employment opportunities to the extent these issues create and/or perpetuate discrimination against protected classes. In addition, AB 686:

- Requires the state, cities, counties, and public housing authorities to administer their programs and activities related to housing and community development in a way that affirmatively furthers fair housing;
- Prohibits the state, cities, counties, and public housing authorities from taking actions materially inconsistent with their AFFH obligation;
- Requires that the AFFH obligation be interpreted consistent with HUD's 2015 regulation, regardless of federal action regarding the regulation;
- Adds an AFFH analysis to the Housing Element (an existing planning process that California cities and counties must complete) for plans that are due beginning in 2021;
- Includes in the Housing Element's AFFH analysis a required examination of issues such as segregation and resident displacement, as well as the required identification of fair housing goals.

The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the County's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

Analysis Requirements

An assessment of fair housing must consider the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. The analysis must address patterns at a regional and local level and trends in patterns over time. This analysis should compare the locality at a

county level or even broader regional level such as a Council of Government, where appropriate, for the purposes of promoting more inclusive communities.

For the purposes of this AFFH, “Regional Trends” describes trends in Los Angeles County (County). “Local Trends” describe trends specific to the City of Commerce.

Sources of Information

The analysis of fair housing issues in Commerce relies on the following sources:

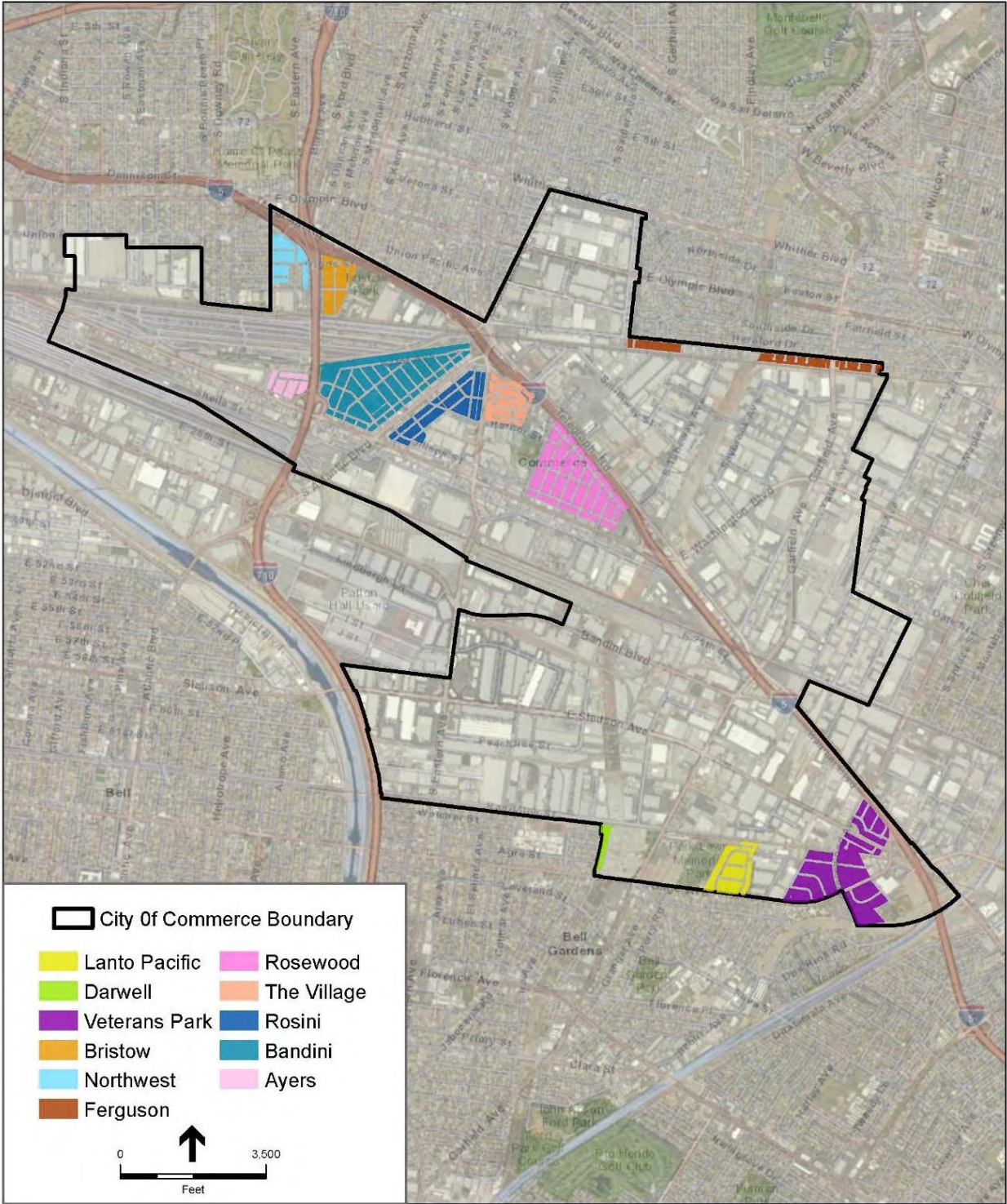
- California Department of Housing and Community Development (HCD) AFFH Data Viewer
- U.S. Census Bureau’s Decennial Census (referred to as “Census”) and 2016-2020 American Community Survey (ACS)
- U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data
- County of Los Angeles 2018 Analysis of Impediments to Fair Housing (2018 AI) prepared by the Los Angeles Community Development Authority (LACDA)
- Local knowledge

Some of these sources provide data on the same topic, but due to various methodologies, results may differ. For example, the decennial census and ACS report slightly different estimates for the total population, number of households, number of housing units, and household size. This is, in part, because ACS provides estimates based on a small survey of the population taken over the course of the whole year. Because of the survey size and seasonal population shifts, some information provided by the ACS is less reliable. For this reason, the readers should keep in mind the potential for data errors when drawing conclusions based on the ACS data used in this chapter. The information is included because it provides an indication of possible trends. As such, even though more recent ACS data may be available, 2016-2020 ACS reports (and 2015-2019 for CHAS data) are cited more frequently.

Local Knowledge

In addition to using federal or state level data sources, local jurisdictions are also expected to use local data and knowledge to analyze local fair housing issues. For purposes of this AFFH, various neighborhoods within the City of Commerce may be identified in the analysis. These neighborhoods are shown on Figure D-1.

Figure D-1: Commerce Residential Neighborhoods



Source: City of Commerce

Assessment of Fair Housing Issues

Fair Housing Enforcement and Outreach

Federal fair housing laws prohibit discrimination based on race, color, religion, national origin, sex/gender, handicap/disability, and familial status. Specific federal legislation and court rulings include:

- **The Civil Rights Act of 1866** – covers only race and was the first legislation of its kind
- **The Federal Fair Housing Act 1968** – covers refusal to rent, sell, or finance
- **The Fair Housing Amendment Act of 1988** – added the protected classes of handicap and familial status
- **The Americans with Disabilities Act of 1990 (ADA)** – covers public accommodations in both businesses and in multi-family housing developments
- **Shelly v. Kramer (1948)** – made it unconstitutional to use deed restrictions to exclude individuals from housing
- **Jones v. Mayer (1968)** – made restrictive covenants illegal and unenforceable

California state fair housing laws protect the same classes as the federal laws with the addition of marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination. Specific State legislation and regulations include:

- **Unruh Civil Rights Act** – extends to businesses and covers age and arbitrary discrimination
- **California Fair Employment and Housing Act (Rumford Act)** – covers the areas of employment and housing, with the exception of single-family houses with no more than one roomer/boarder
- **California Civil Code Section 53** – takes measures against restrictive covenants
- **Department of Real Estate Commissioner's Regulations 2780-2782** – defines disciplinary actions for discrimination, prohibits panic selling and affirms the broker's duty to supervise
- **Business and Professions Code** – covers people who hold licenses, including real estate agents, brokers, and loan officers.

Regional Trend

During the 2018 AI development process, LACDA implemented a series of outreach efforts including: regional discussion groups; four focus groups which met three times each, aimed to address disability and access, education, employment and transportation, and healthy neighborhoods; Resident Advisory Board Meetings; community input meetings; and the 2017 Resident Fair Housing Survey. Regional discussions included developer groups, companies, organizations, and agencies, and government groups,

including the City of Commerce. The following topics were covered in the Government Discussion Group meeting:

- Lack of jurisdictions that have R/ECAP areas
- Discussion of community meetings
- Discussion of surveys
- City of Los Angeles R/ECAP areas
- Social engineering in the past due to highway construction and designing of public housing in poor areas by private, federal, and local governments
- Setting realistic goals and outcomes
- Housing Rights Center (HRC) - protected classes different in state verses federal law
- Mortgages based on disparate impact-census areas
- Disparate impacts on women

R/ECAPs are discussed in Chapter 3, Racially or Ethnically Concentrated Areas of Poverty, of this Assessment of Fair Housing. Historical trends, zoning, and home loan trends are also discussed in Chapter 5, Disproportionate Housing Needs, of this Assessment of Fair Housing.

Focus group meetings for preparation of the 2018 AI focused on the following contributing factors:

- **Education** – Attendees discussed the location of proficient schools, inadequate funding for schools both public and charter, lack of information on the transfer process for parents, and child safety when walking to school. Attendees expressed concern about school of choice and funding for under-performing schools, promotion of educational opportunities to parents, and safety.
- **Transportation and Jobs** – Attendees discussed lack of available clothing for employment, lack of resources and services for working families, stigma of transgender employees, and the prevalence of low skill workers. They expressed concern about the lack reliable transportation, jobs located far from workers, and childcare expenses.
- **Healthy Neighborhoods** – This focus group discussed location and access to grocery stores, illegal dumping, poor access to quality healthcare, and general public safety concerns such as safe streets and homeless encampments. There were concerns related to industrial facilities in communities highly burdened by air pollution, proximity to air pollution, bike and pedestrian improvements, and greenhouse gas emission reduction strategies.
- **Disability and Access** – The disability and access focus group discussed availability of accessible housing options, lack of knowledge of the ADA's Right to Reasonable Accommodation, overlapping needs of people with multiple disabilities, and a long waitlist for accessible and affordable housing.

A total of 6,290 responses were recorded from the 2017 Resident Fair Housing Survey. The survey found that most residents thought their neighborhood had adequate access to public transportation, cleanliness, and schools, and that the condition of public spaces and buildings were good, very good, or excellent. More residents reported availability of quality public housing and job opportunities were only fair or poor. The survey also found that households with a person with a disability found it more difficult to get around their neighborhood or apartment complex. Access to opportunities, housing conditions, and populations of persons with disabilities in Commerce are further discussed below in this Assessment of Fair Housing Issues.

According to HUD's Office of Fair Housing and Equal Opportunity (FHEO) records, 130 housing discrimination cases were filed in Los Angeles County in 2020, compared to 291 in 2010. In 2020, a majority of cases were related to disability (66 percent). Another 21 percent of cases were related to racial bias. The percent of cases related to disability has increased significantly since 2010, when only 36 percent of cases reported a disability bias. Figure D-2 shows the number of FHEO inquiries throughout the County. Signal Hill has the highest concentration of inquiries (more than one inquiry per 1,000 people). Other areas with high concentrations of inquiries (one inquiry per 1,000 people) are located in Santa Monica, West Hollywood, Culver City, Irwindale and Lomita.

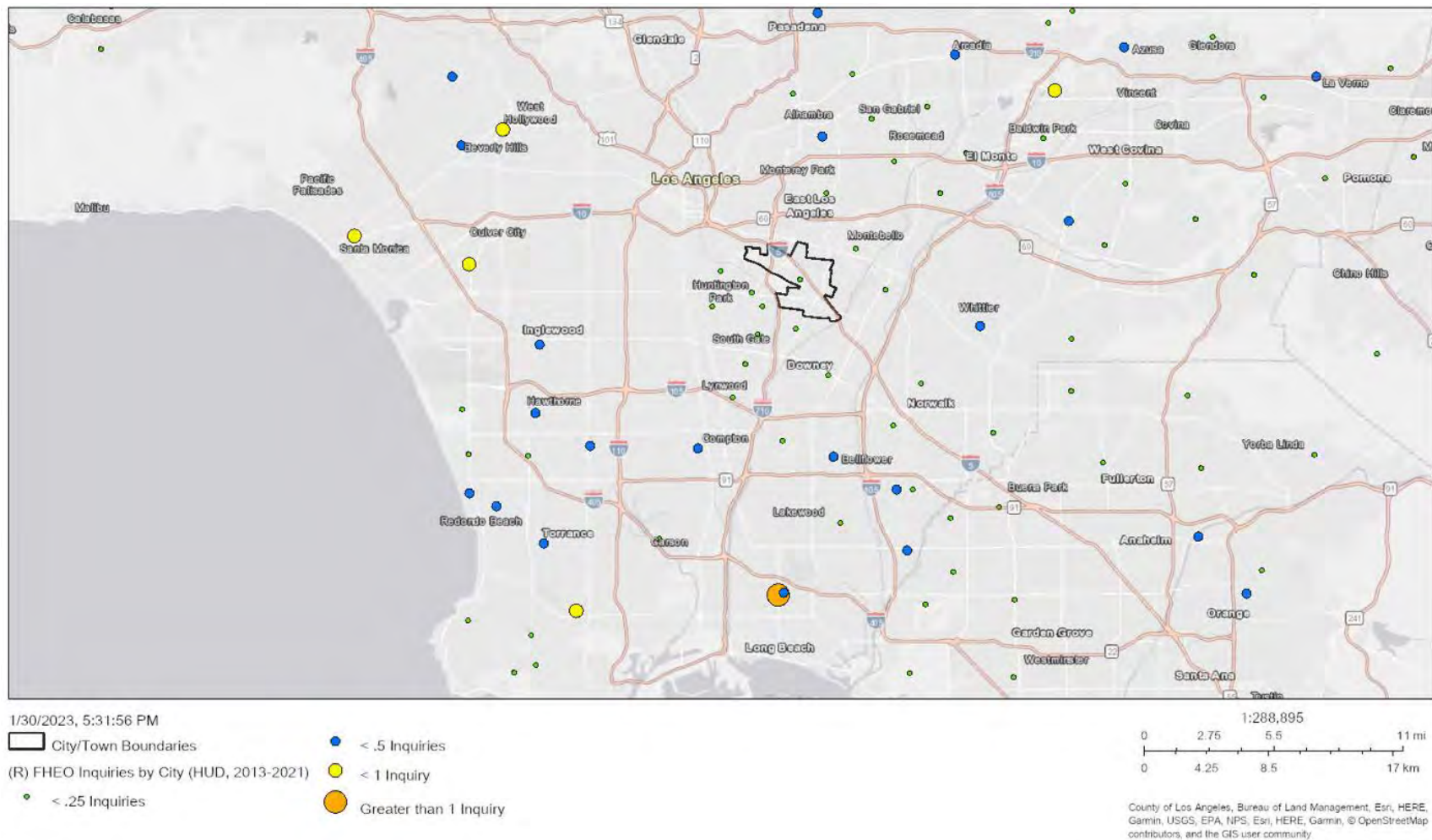
Founded in 1968, the Housing Rights Center (HRC) is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing.¹ HRC serves cities throughout Los Angeles County, including Commerce.

Local Trend

According to the HCD AFFH Data Viewer, there has been only two FHEO inquiries in Commerce since 2013. Both were unrelated to a specific basis of discrimination and one was found to have no valid issue. There is no additional discrimination complaint or case data available for the City of Commerce.

¹ Housing Rights Center, www.housingrightscenter.org

Figure D-2: Regional Fair Housing Inquiries



CAHCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022.

Integration and Segregation

Race and Ethnicity

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility. The following analysis of racial/ethnic segregation includes racial/ethnic minority population trends, maps of minority concentrated areas over time, and an analysis of the City's sites inventory.

Regional Trend

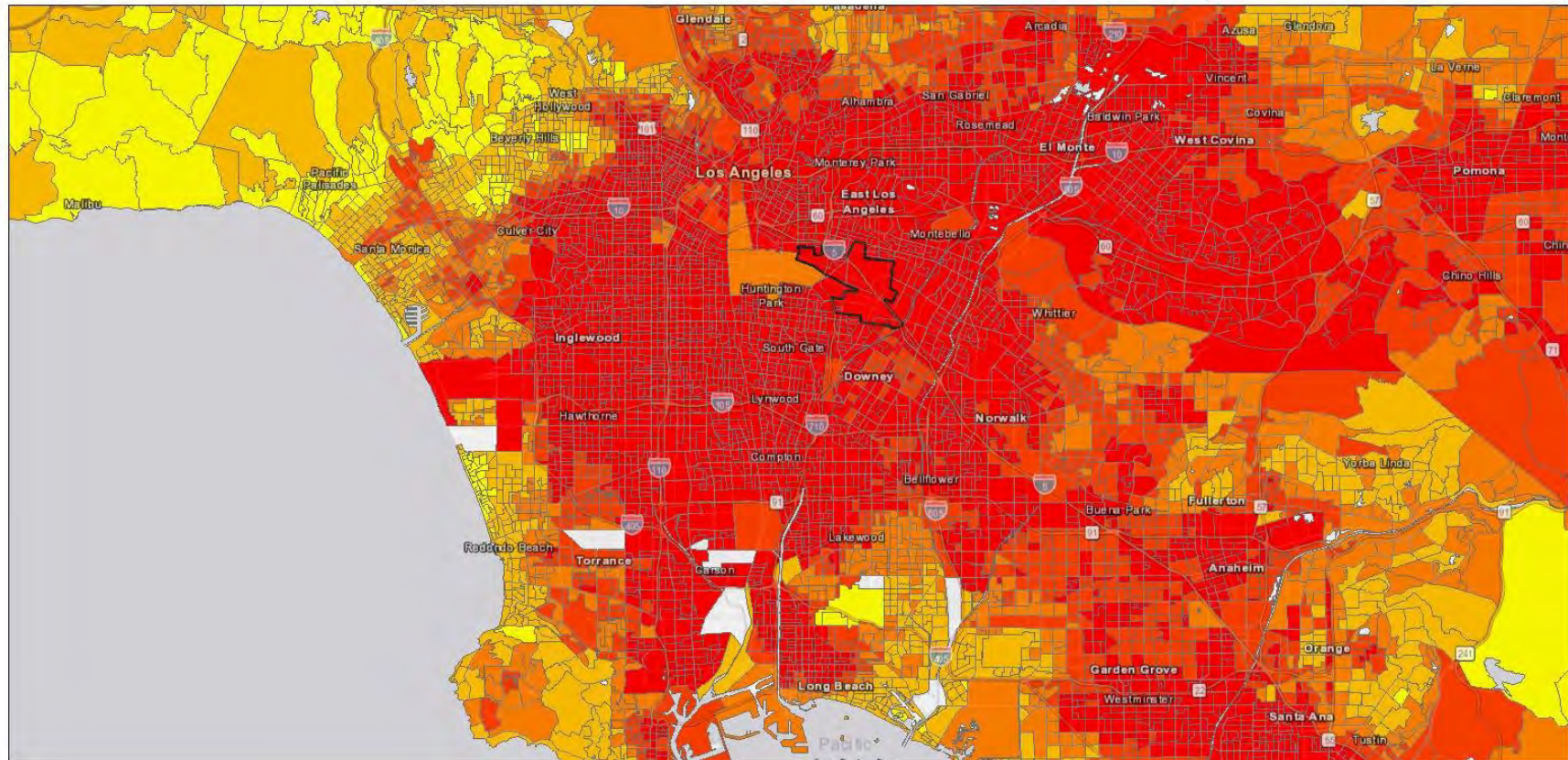
As shown in Table D-1 racial/ethnic minority groups make up 74 percent of the Los Angeles County population. Nearly half of the Los Angeles County population is Hispanic/Latino (48 percent), 26 percent of the population is White, 15 percent is Asian, and eight percent is Black/African American. Commerce and the neighboring cities are primarily Hispanic or Latino. Downey's percentage of Hispanic or Latino residents is 74 percent, while 98 percent of Maywood residents are Hispanic or Latino. White residents make up the next largest percentage of residents in the County, Commerce and neighboring cities with the exception of Montebello, where Asian residents comprise the second largest percentage in the city.

Table D-1: Racial/Ethnic Composition – LA County, Commerce and Surrounding Cities

	Bell	Bell Gardens	Commerce	Downey	Maywood	Montebello	Pico Rivera	LA County
Hispanic or Latino	89.7%	96.2%	95.2%	74.2%	97.6%	79%	90.5%	48.3%
White	5.6%	2%	2.3%	14%	0.9%	6.6%	4.8%	25.9%
Black/African American	3%	1%	0.7%	3.1%	0.3%	0.6%	0.8%	7.8%
American Indian and Alaska Native	0.2%	0.1%	0.7%	0.1%	---	0.1%	0.1%	0.2%
Asian	0.8%	0.4%	0.9%	6.9%	0.5%	13%	3.5%	14.6%
Native Hawaiian and Other Pacific Islander	0.2%	---	0.0%	0.2%	---	---	0.1%	0.2%
Some other race	0.1%	---	0.1%	0.2%	0.8%	0.1%	0.1%	0.4%
Two or more races	0.3%	0.2%	0.1%	1.3%	---	0.5%	0.2%	2.6%

Source: 2016-2020 ACS, Table DP05

Figure D-3 shows that most areas in Los Angeles County have high concentrations of racial/ethnic minorities. Coastal cities, including Santa Monica and Redondo Beach, and the areas surrounding Beverly Hills, West Hollywood, and the Pacific Palisades neighborhood generally have smaller non-White populations. Most block groups in the South Bay, San Gabriel Valley, San Fernando Valley, and central Los Angeles areas have majority racial/ethnic minority populations. Commerce's racial/ethnic minority populations are comparable to surrounding jurisdictions.

Figure D-3: Regional Racial/Ethnic Minority Concentrations by Block Group (2018)

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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

≤ 20%

21 - 40%

41 - 60%

61 - 80%

> 81%

1:288,895

0 2.75 5.5 11 mi
0 4.25 8.5 17 km

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

CA HCD

County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022.

Local Trend

According to the 2016-2020 ACS, Commerce's population in 2020 was 95 percent Hispanic or Latino and two percent White. All other races and ethnicities are less than one percent of the total population. Since 2010, the Hispanic or Latino population increased by about four percent and the American Indian and Alaska Native population increased by about a half a percent. All other races and ethnicities either stayed the same or decreased in Commerce between 2010 and 2020.

Table D-2: Change in Racial/Ethnic Composition (2010-2020)

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

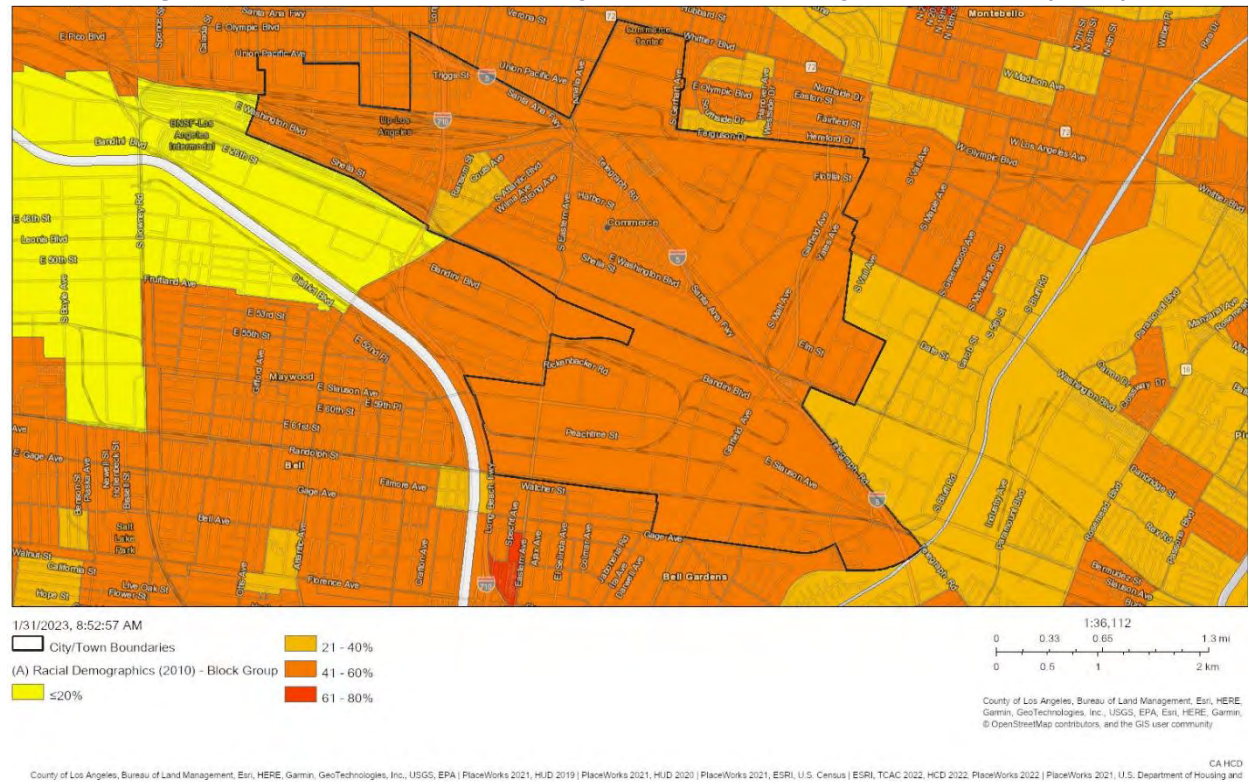
Source: 2006-2010 and 2016-2020 ACS, Table DP05

Figure D-4 and Figure D-5 compare racial or ethnic minority concentrations in Commerce in 2010 and 2018. All areas of the City have seen an increase in minority populations since 2010 and Commerce is now more than 81 percent non-White.

Distribution of RHNA Units by Percent Minority Concentration

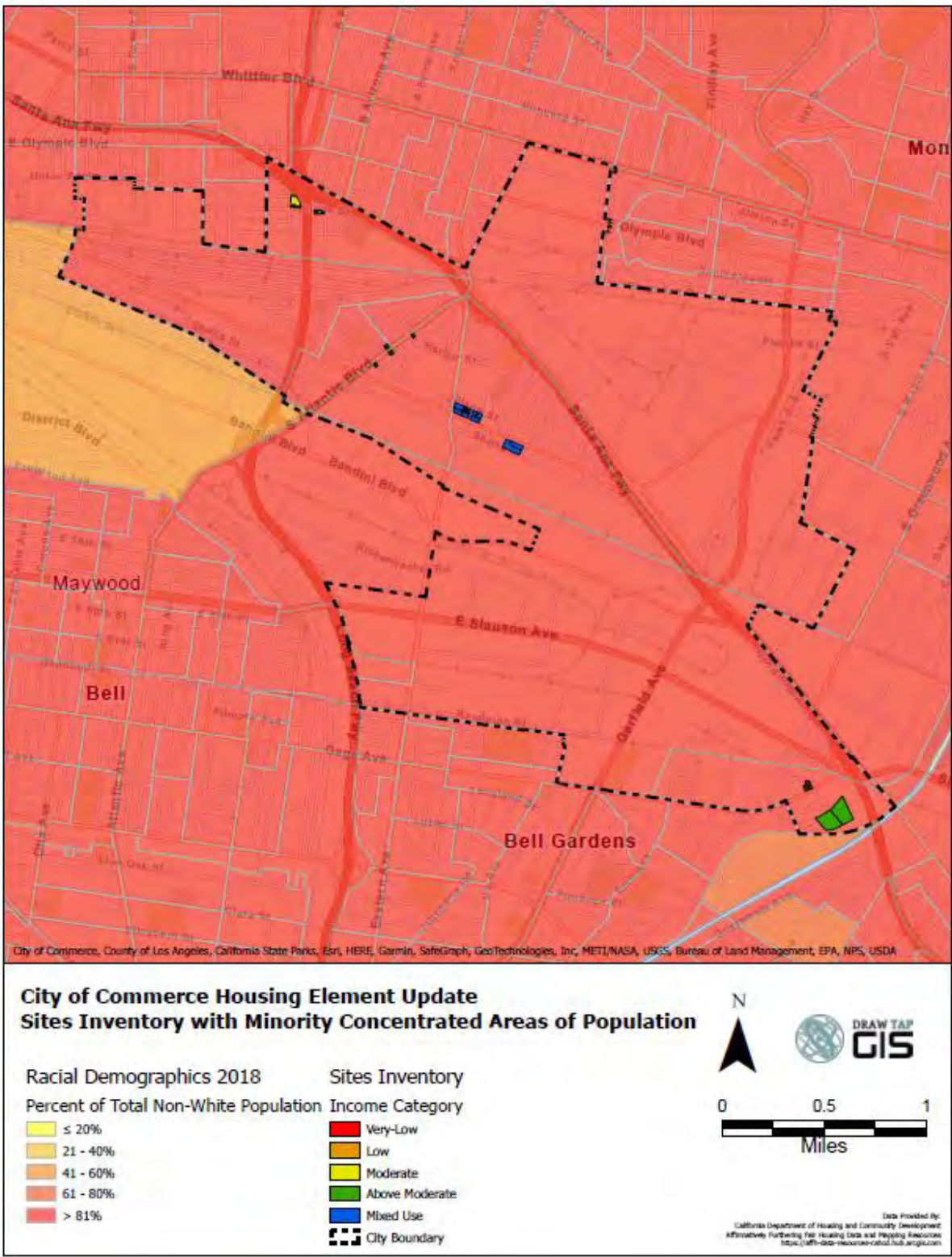
As described above, the City of Commerce is 95 percent Hispanic and two percent White. All other races and ethnicities are less than one percent of the total population. The City's site inventory shown on Figure D-5 includes units of all income categories and will provide housing opportunities for Commerce's Hispanic and other minority residents.

Figure D-4: Racial/Ethnic Minority Concentrations by Block Group (2010)



Source: HCD AFFH Data Viewer (2018), 2022.

Figure D-5: Racial/Ethnic Minority Concentrations by Block Group and Sites Inventory (2018)



Source: HCD AFFH Data Viewer (2018), 2022

Disability

Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trend

According to the 2016-2020 ACS, 10 percent of Los Angeles County residents experience a disability. Commerce has a larger population that experiences a disability (13 percent). Commerce also has the highest number of disabled residents compared to the neighboring cities of Bell (9 percent), Bell Gardens (6 percent), Downey (9 percent), Maywood (7 percent), Montebello (13 percent) and Pico Rivera (9 percent).

As shown in Figure D-6, less than 20 percent of the population in most tracts in Los Angeles County experience a disability. Tracts with disabled populations exceeding 20 percent are not concentrated in one area of the County. Tracts with populations of persons with disabilities exceeding 20 percent are near the cities of Inglewood, Los Angeles, Long Beach, Norwalk, and Santa Monica. The coastal cities of El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach tend to have smaller disabled populations.

Local Trend

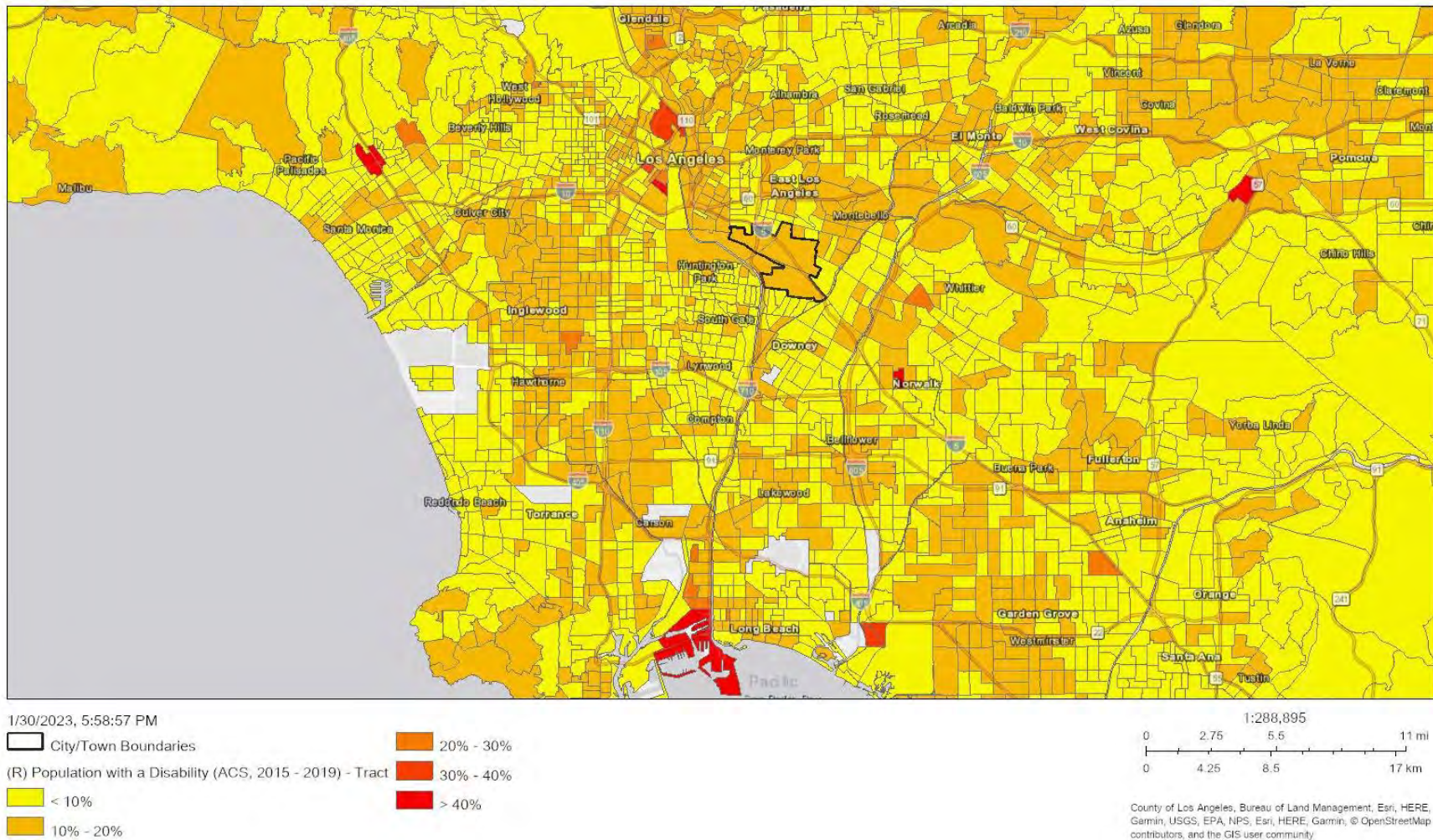
All tracts in Commerce have populations of persons with disabilities between 10 and 20 percent (Figure D-7). The concentration of persons with disabilities in Commerce is comparable or slightly greater to neighboring jurisdictions. Ambulatory difficulties, independent living and cognitive difficulties are the most common disability type in Commerce; seven percent of the population experiences an ambulatory difficulty, seven percent experiences an independent living difficulty, seven percent experiences a cognitive difficulty, four percent experiences a self-care difficulty, three percent experiences a vision difficulty, and two percent experiences a hearing difficulty.

Disabilities are generally more common amongst aging populations. Approximately 30 percent of seniors in Commerce, age 65 or older, have a disability. Approximately 18 percent of the population citywide is aged 65 or older.

Distribution of RHNA Units by Percent Population with Disabilities

All sites selected to meet the 2021-2029 RHNA are in tracts where 10 to 20 percent of the population experiences one or more disabilities (Figure D-7). The City's RHNA strategy does not concentrate RHNA units of any income level in areas where populations of persons with disabilities are more prevalent.

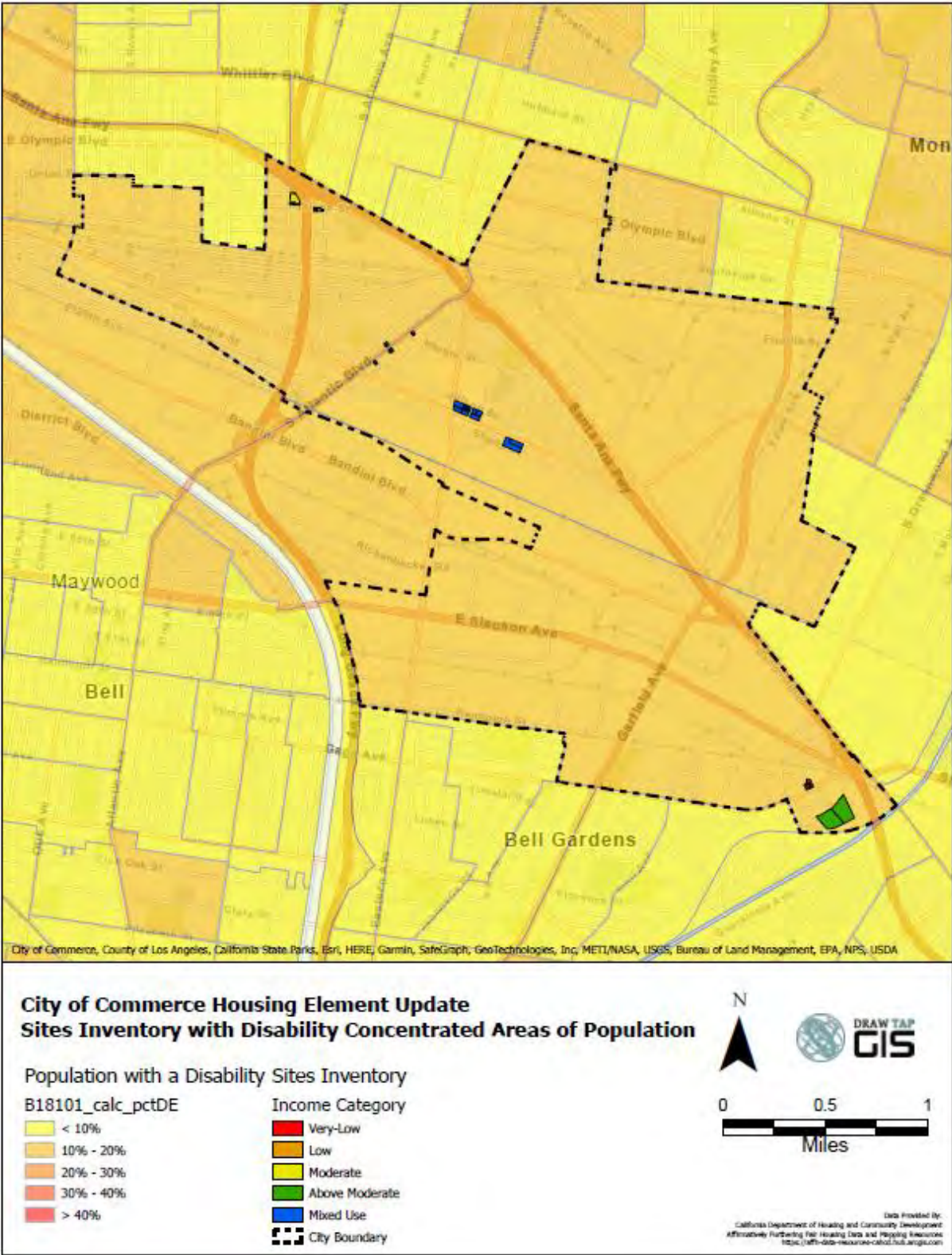
Figure D-6: Regional Concentrations of Persons with Disabilities by Tract



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

Figure D-7: Concentration of Persons with Disabilities by Tract and Sites Inventory



Source: HCD AFFH Data Viewer (2018), 2022

Family Status

Familial status refers to the presence of children under the age of 18, regardless of whether the child is biologically related to the head of household, and the marital status of the head of household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

Regional Trend

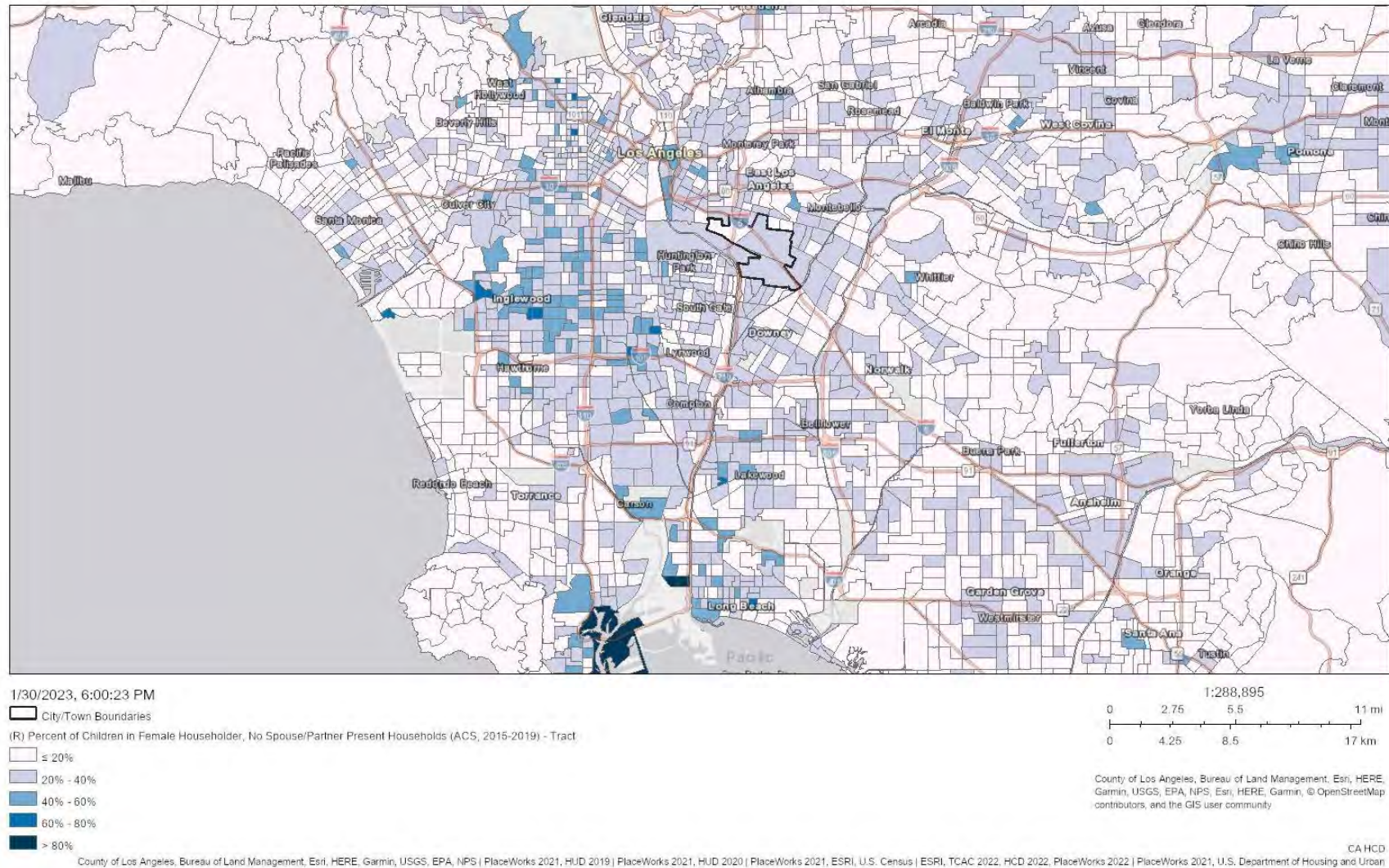
According to the 2016-2020 ACS, 28 percent of households in Los Angeles County have children under the age of 18 (Table D-3). When looking at Commerce and neighboring cities, all have a greater percentage than the County as a whole. Bell Gardens and Maywood have the highest percentage (46 percent and 45 percent, respectively) while Pico Rivera and Montebello have the lowest (29 percent and 30 percent, respectively). For married couple households with children, Bell Gardens and Maywood have the highest percentage (55 percent and 51 percent, respectively) while Montebello and Commerce have the lowest (38 percent and 41 percent, respectively). Approximately 42 percent of married households, 37 percent of single male-headed households and 42 percent of single female headed households in the County have children. In the area in and around Commerce, Downey has the highest percentage (55 percent) of single male-headed households while Maywood has the highest percentage (57 percent) of single female-headed households. Pico Rivera has the lowest percentage of both single male- and single female-headed households (22 percent and 30 percent, respectively).

Figure D-8 shows the percent of children living in single-parent female-headed households by tract in LA County. Children in female-headed households are most concentrated in Inglewood, the City of Los Angeles, unincorporated Los Angeles County communities, and areas within Long Beach and Lakewood. In general, there are more children living in female-headed households in the central Los Angeles County areas, including Commerce and neighboring cities, compared to the South Bay, Westside, Gateway, San Fernando Valley, and San Gabriel Valley cities.

Table D-3: Households with Children Under the Age of 18

	Bell	Bell Gardens	Commerce	Downey	Maywood	Montebello	Pico Rivera	LA County
All Households	42.2%	46.4%	31.7%	36.8%	44.6%	30.5%	28.9%	27.6%
Married Couple Households	49.9%	55.4%	41.1%	43.8%	51.3%	38.3%	40.6%	42.0%
Single Male Households	39.9%	48.9%	32.6%	55.4%	50.9%	34.3%	22.2%	37.4%
Single Female Households	56.3%	53.5%	48.4%	47.3%	57.1%	42.7%	29.6%	42.3%

Source: 2016-2020 ACS, Table S1101

Figure D-8: Regional Percent of Children in Female-Headed Households by Tract

Source: HCD AFFH Data Viewer (2018), 2022

Local Trend

According to 2020 ACS five-year estimates, about 32 percent of households have children under the age of 18 (Table D-3). The City's share of households with children is higher than the neighboring cities of Montebello (30 percent) and Pico Rivera (29 percent) and the County overall (28 percent) but lower than Bell (42 percent), Bell Gardens (46 percent), Downey (37 percent) and Maywood (45 percent).

Single parent households are also protected by fair housing law. As shown in Table D-3, 33 percent of single male-headed households and 48 percent of single female-headed households in Commerce have children. Figure D-9 shows that the tract in the northwestern part of Commerce (includes the Northwest, Bristow, Ayers and Bandini neighborhoods west of Atlantic Boulevard) has less than 20 percent of children living in single female-headed households. The remaining tracts in the City have 20 percent to 40 percent of children living in single female-headed households.

Distribution of RHNA Units by Familial Status

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units counted toward meeting the RHNA is the development of the approved Modelo Specific Plan. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175 percent of AMI).

Table D-4 and Table D-5 show the unit distribution by percent of children living in married-couple and female-headed households. A higher percentage of moderate and above moderate income units are located in the tracts with fewer children in married-couple households (40 to 60 percent) and more female headed-households (20 to 40 percent). The City's RHNA strategy does not place a disproportionate amount of lower income units in areas with a greater percentage of female headed-households. Furthermore, the Modelo Specific Plan provides flexibility in unit sizes in order to facilitate the development of a range of unit sizes and to accommodate multigenerational living.

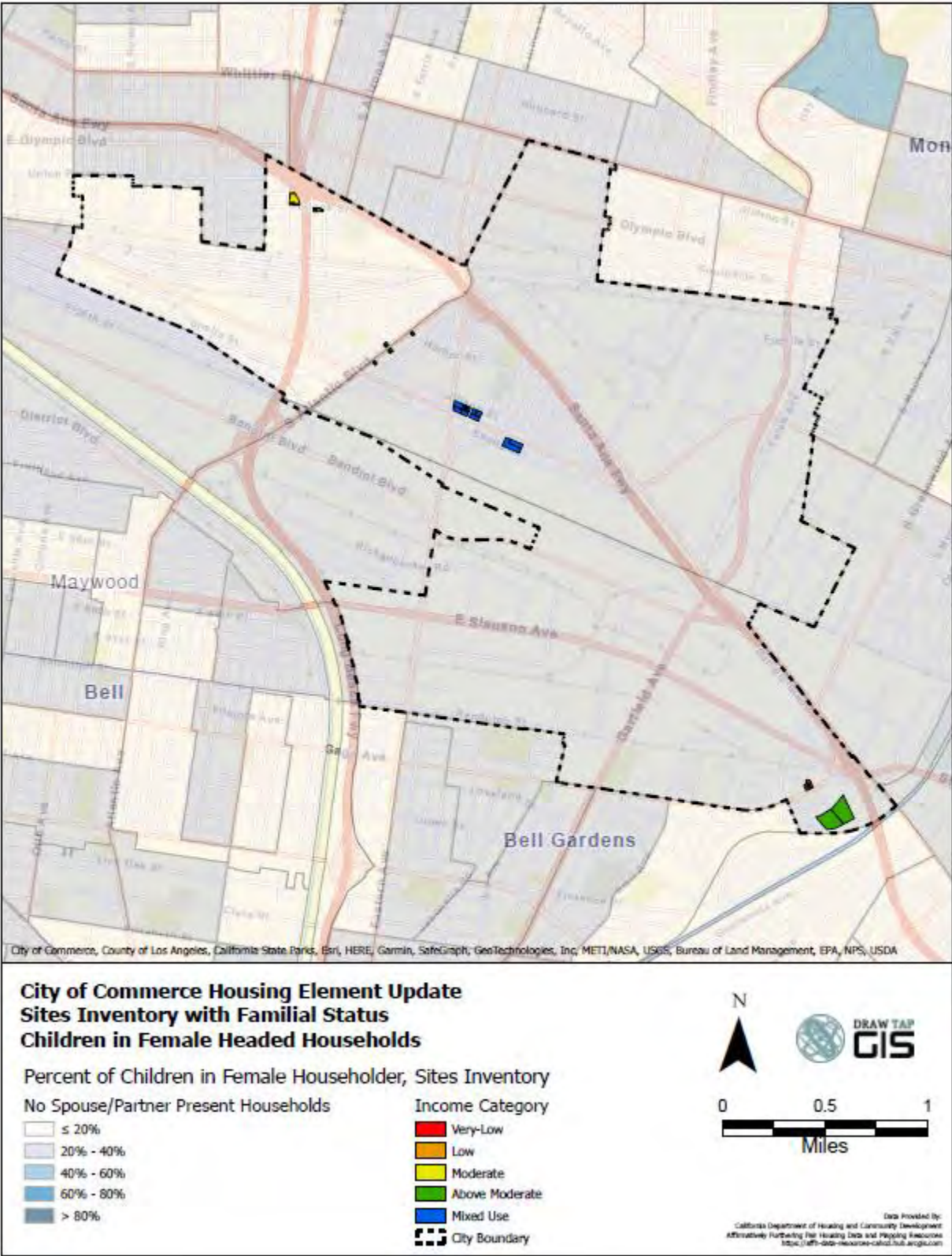
Table D-4: RHNA Unit Distribution by Percent of Children Living in Married-Couple Households

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
40-60%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
60-80%	143	92.3%	96	100.0%	117	12.1%	356	29.2%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

**Table D-5: RHNA Unit Distribution by Percent of Children Living in
Female-Headed Households**

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
20-40%	155	100.0%	79	82.3%	952	98.4%	1,186	97.4%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

Figure D-9: Children in Single Female-Headed Households and Sites Inventory - Commerce



Source: HCD AFFH Data Viewer (2018), 2022

Income

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. A stable income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population.

Households with lower incomes are limited in their ability to balance housing costs with other needs and often the ability to find housing of adequate size. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

For purposes of most housing and community development activities, HUD has established the four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions. Table D-6 compares the HUD and State income categories. HUD defines a Low and Moderate Income (LMI) area as a census tract or block group where over 51 percent of the households earn extremely-low, low, or moderate incomes (<81 percent AMI). This means LMI areas (<81 percent AMI) as defined by HUD, are lower income areas (extremely low, very low, and low), as defined by HCD. These terms may be used interchangeably.

Table D-6: Income Category Definitions

HCD Definition		HUD Definition	
Extremely Low	0%-30% of AMI	Extremely Low	0%-30% of AMI
Very Low	31%-50% of AMI	Low	31%-50% of AMI
Low Income	51%-80% of AMI	Moderate	51%-80% of AMI
Moderate income	81%-120% of AMI	Middle/Upper	> 81% of AMI
Above Moderate Income	>120% of AMI	--	--

Note: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas and uses Los Angeles Metro Area for Los Angeles County.

Regional Trend

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation.

About 56 percent of County households are considered lower income (Table D-7). Commerce and almost all surrounding cities have a greater percentage of lower income households than the County, ranging from 62 percent in Pico Rivera to 87 percent in Bell Gardens. Downey has a similar percentage of lower income households (55 percent) as the County overall.

Table D-7: Regional Income Distribution

	Bell	Bell Gardens	Commerce	Downey	Maywood	Montebello	Pico Rivera	LA County
< 80% AMI	83%	87%	72%	55%	79%	66%	62%	56%
> 80%AMI	17%	13%	28%	45%	21%	34%	38%	44%
Total HH	8,970	9,825	3,535	33,045	6,695	18,890	16,850	3,316,795

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, based on 2015-2019 ACS

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers. Furthermore, because HUD programs do not cover households with incomes above 80 percent of the County Area Median Income (AMI), CHAS data does not provide any breakdown of income groups above 80 percent AMI.

Figure D-10 shows the median income for the County, Commerce and neighboring jurisdictions. Based on the 2020 ACS data, Commerce and almost all surrounding cities have a lower median income than the County overall (\$71,358). Downey is the only city with a higher median income (\$75,974).

Figure D-10: Regional Median Income

Source: 2016-2020 ACS, Table DP03

Figure D-11 shows LMI areas regionally. Coastal cities, from Rancho Palos Verdes to El Segundo, and the Pacific Palisades neighborhood have low concentrations of LMI households. In most tracts in these areas, less than 25 percent of the population is LMI. LMI households are most concentrated in the central Los Angeles County region around the City of Los Angeles. There are smaller concentrations of LMI households in and around the cities of Glendale, El Monte, San Fernando, and Long Beach. Commerce has LMI household concentrations consistent with neighboring cities.

Local Trend

Almost three-fourths (72 percent) of Commerce households are lower income (<80 percent AMI). As seen in Figure D-12, the highest concentrations (75 percent to 100 percent) of lower income households are located in the western area (encompassing the Northwest, Bristow, Ayers and western portion of the Bandini neighborhoods) and northern area (including the Ferguson neighborhood) of the city. The central area of Commerce (The Village and Rosewood residential neighborhoods) has the lowest percentage (49 percent) of LMI households.

As seen in Figure D-10, the median income in Commerce was \$54,639 in 2020. Figure D-13 shows that the block group with the highest median income (between \$55,000 and \$87,100) in Commerce is the same area with the lowest percentage of LMI households.

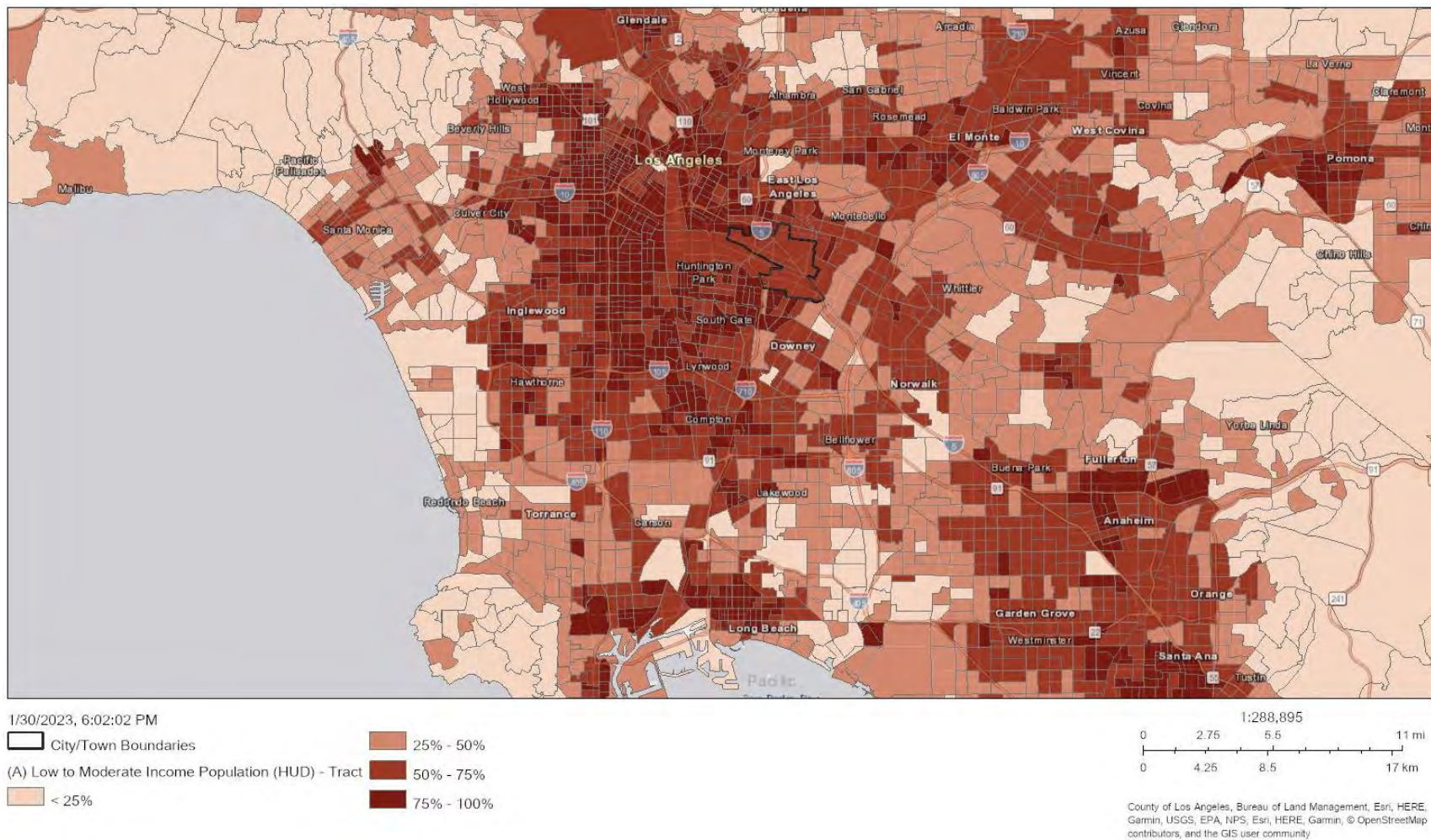
Distribution of RHNA Units by Percent of Low and Moderate Income Population

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units counted toward meeting the RHNA are within the approved Modelo Specific Plan development. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175% percent of AMI).

Table D-8 shows the unit distribution by percent LMI population. Most of the lower income units (92 percent) are placed in the central area of Commerce that has the lowest percentage (49 percent) of LMI households. These lower income units are also located in proposed mixed-use zones and will be part of mixed-income (low, moderate and above moderate) projects. The majority of above moderate income units (75 percent) are located in the areas of the City with a greater percentage of LMI households. This will provide for mobility options and a rebalancing of housing opportunities for the City's residents by introducing new housing types in the community.

Table D-8: RHNA Distribution by LMI Population

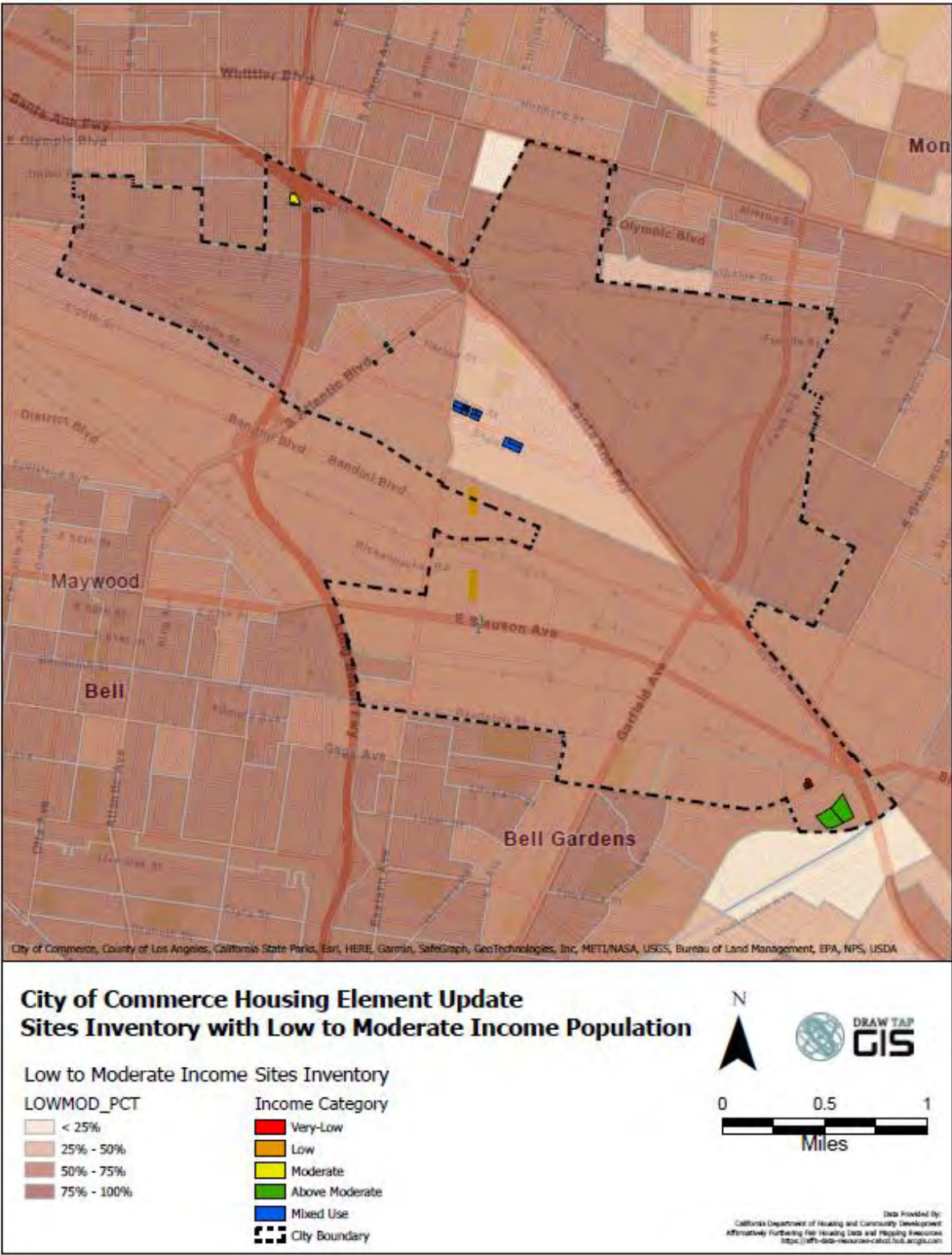
	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
25-50%	143	92.3%	79	82.3%	78	8.1%	300	24.6%
50-75%	12	7.7%	0	0.0	884	91.4%	898	73.7%
75-100%	0	0.0%	17	17.7%	5	0.5%	22	1.8%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

Figure D-11: Regional LMI Household Concentrations by Tract

CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

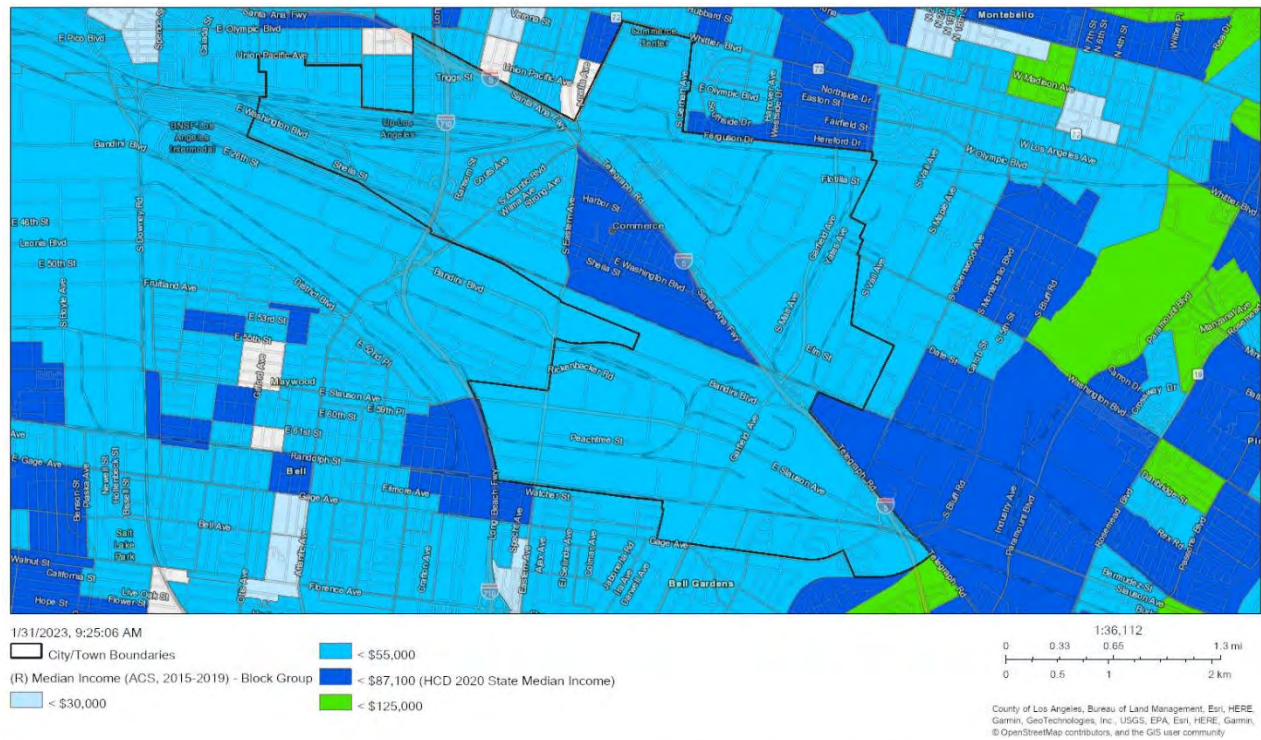
Source: HCD AFFH Data Viewer (2018), 2022

Figure D-12: Commerce LMI Household Concentrations and Site Inventory by Block Group



Source: HCD AFFH Data Viewer (2018), 2022

Figure D-13: Commerce Median Income by Block Group



Source: HCD AFFH Data Viewer (2018), 2022

Housing Choice Vouchers and Public Housing

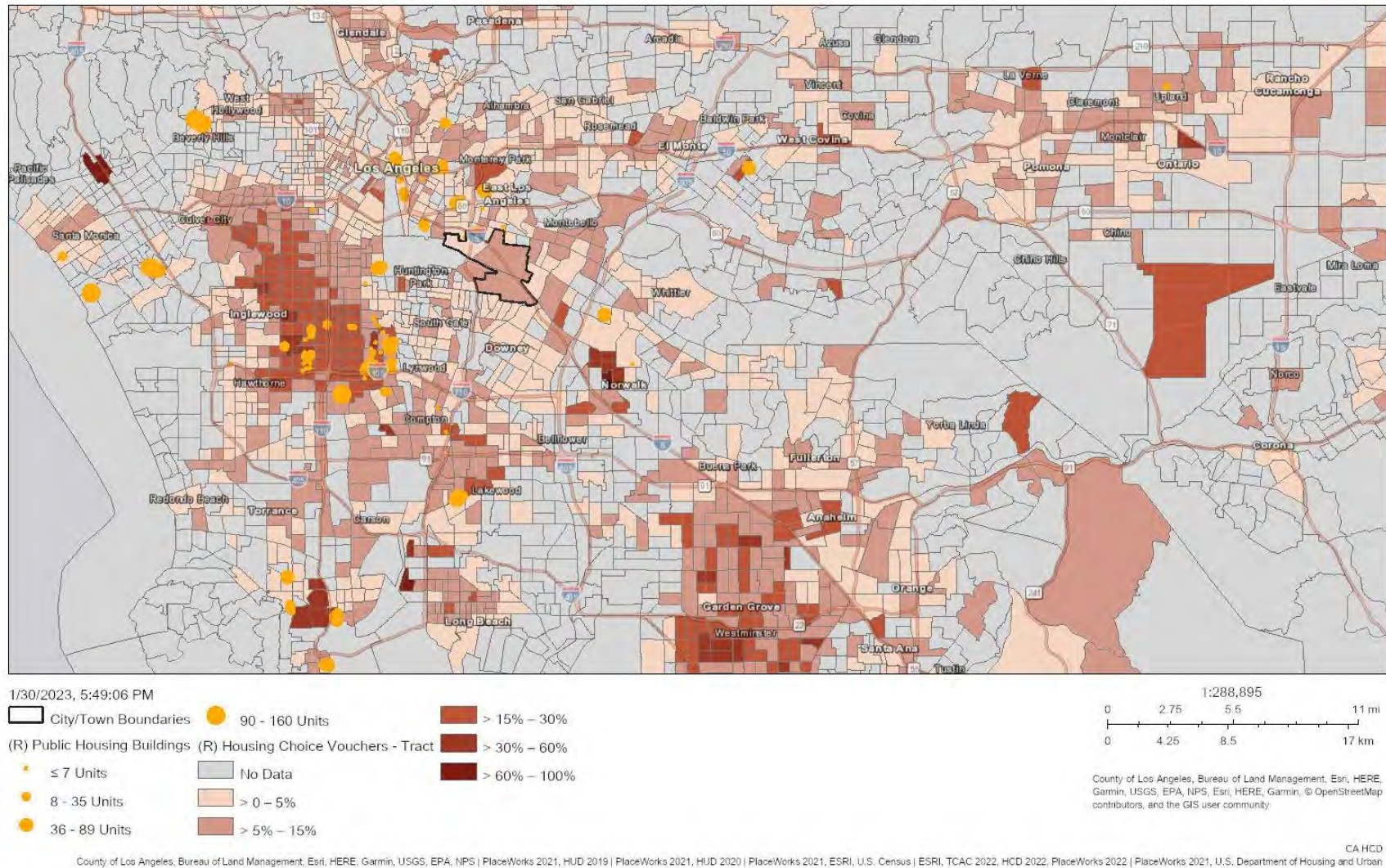
The Housing Choice Voucher Program (HCV) provides rental assistance to very low-income households who obtain housing in the private rental market. The HCV program's success depends upon the ability of participants to search for and find suitable housing in the private rental market. The program encourages participants to avoid high-poverty neighborhoods and encourages the recruitment of landlords with rental properties in lower-poverty neighborhoods. An analysis of the trends in HCV concentration can be useful in examining the success of the program in improving the living conditions and quality of life of its holders.

HCV programs are managed by Public Housing Agencies (PHAs), and the programs assessment structure (SEMAPS) includes an "expanding housing opportunities" indicator that shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration. A study prepared by HUD's Development Office of Policy Development and Research found a positive association between the HCV share of occupied-housing and neighborhood poverty concentration and a negative association between rent and neighborhood poverty. This means that HCV use was concentrated in areas of high poverty where rents tend to be lower. In areas where these patterns occur, the program has not succeeded in moving holders out of areas of poverty.

Regional Trend

LACDA administers the HCV program in Los Angeles County. LACDA provides rental assistance to over 23,000 low-income families through the program. Figure D-14 shows housing choice voucher (HCV) recipients by tract as well as public housing buildings located in the County. As seen, HCVs are most concentrated in areas within the City of Los Angeles, the cities of Inglewood, Long Beach, Lakewood, and Norwalk, and several unincorporated County areas. Public housing buildings are concentrated in the same locations. However, there are many public housing buildings scattered throughout the County.

Figure D-14: Regional Housing Choice Vouchers and Public Housing Locations

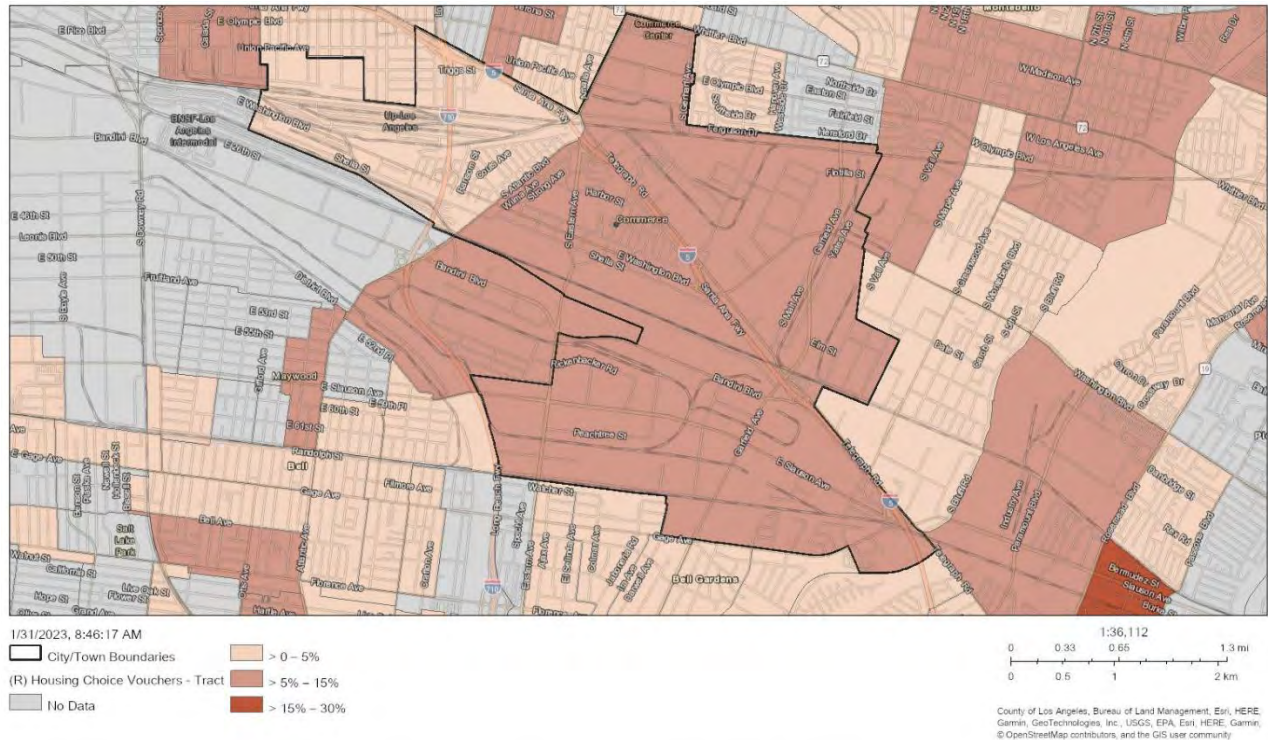


Source: HCD AFFH Data Viewer (2018), 2022.

Local Trend

In Commerce, the highest concentrations of renters receiving housing choice vouchers (HCVs) are located east of Atlantic Boulevard (Figure D-15). In the tract west of Atlantic Boulevard approximately three percent of renters utilize HCVs. The tract east of Atlantic Boulevard and north of the railroad has approximately ten percent of renters with HCVs while the tract south of the railroad has approximately 11 percent. While there are a few public housing buildings adjacent to Commerce, none are located within the city limits.

Figure D-15: Housing Choice Vouchers in Commerce



Source: HCD AFFH Data Viewer (2018), 2022.

Racially or Ethnically Concentrated Areas of Poverty

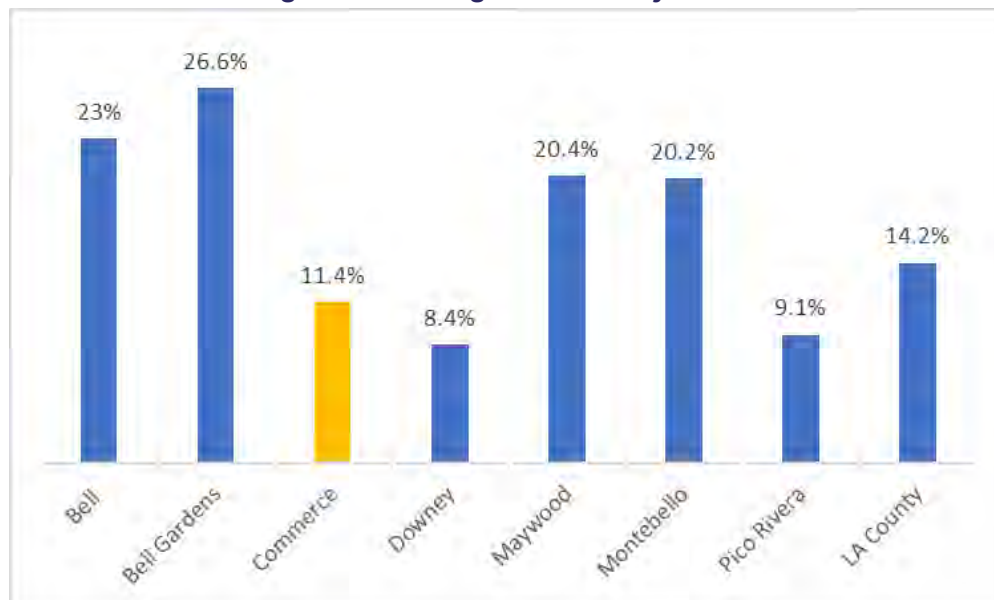
Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD identified census tracts with a majority non-White population with a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. HCD and the California Tax Credit Allocation Committee (TCAC) convened as the Fair Housing Task Force to create opportunity maps. The maps also identify areas of high segregation and poverty. TCAC Opportunity Maps are discussed in more detail in the following section of this fair housing assessment.

Regional Trend

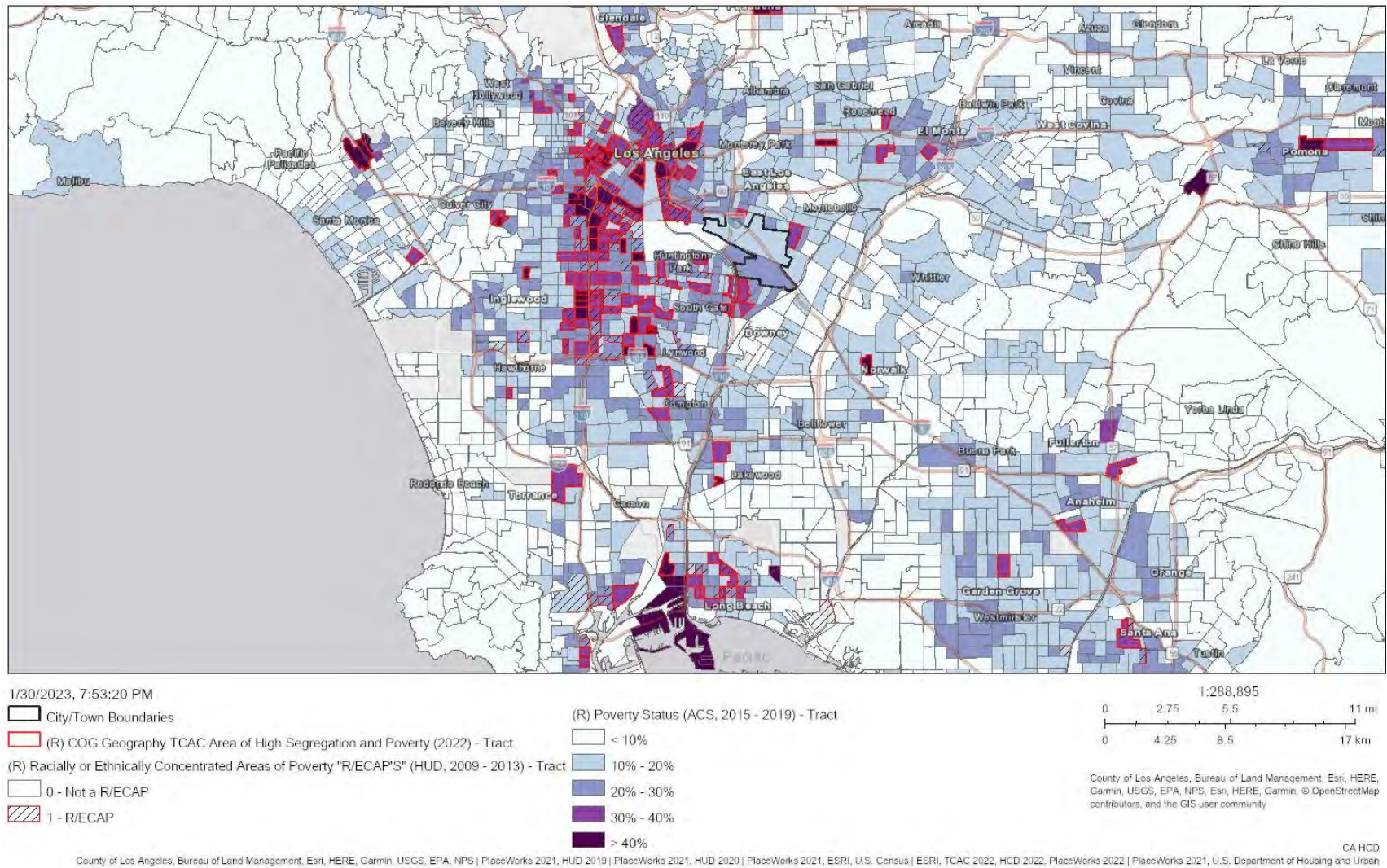
Approximately 14 percent of the County population is below the federal poverty level (Figure D-16). For Commerce and the surrounding cities, Downey, Commerce and Pico Rivera all have lower percentages of residents living below the poverty level than the County overall. Bell, Bell Gardens, Maywood and Montebello have more residents living in poverty.

Figure D-16: Regional Poverty Status



Source: 2016-2020 ACS, Table DP03

Figure D-17 shows R/ECAPs, TCAC designated areas of high segregation and poverty, and poverty status in the Los Angeles County region. R/ECAPs and areas of high segregation and poverty are concentrated in the central County areas around the City of Los Angeles as well as in and around the City of Long Beach. Tracts with larger populations of persons experiencing poverty are also concentrated in these areas.

Figure D-17: R/ECAPs, TCAC Areas of High Segregation and Poverty, and Poverty Status by Tract

Source: HCD AFFH Data Viewer (2018), 2022

Local Trend

As presented in Figure D-16 above, approximately 11 percent of Commerce residents live below the poverty level. As seen in Figure D-18, the tract in the southern part of Commerce has a higher percentage of persons living in poverty (20 percent to 30 percent) compared to the rest of the City. While no R/ECAPs are located within Commerce, several are nearby including in the city of Bell and the unincorporated County. Several areas of segregation and high poverty are also adjacent to Commerce.

**Figure D-18: Commerce and Surrounding Areas:
R/ECAPs, TCAC Areas of High Segregation and Poverty, and Poverty Status by Tract**



Source: HCD AFFH Data Viewer (2018), 2022.

Racially/Ethnically Concentrated Areas of Affluence (RCAAs)

While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, a RCAA is defined as affluent, White communities. According to HUD's policy paper, "Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities."

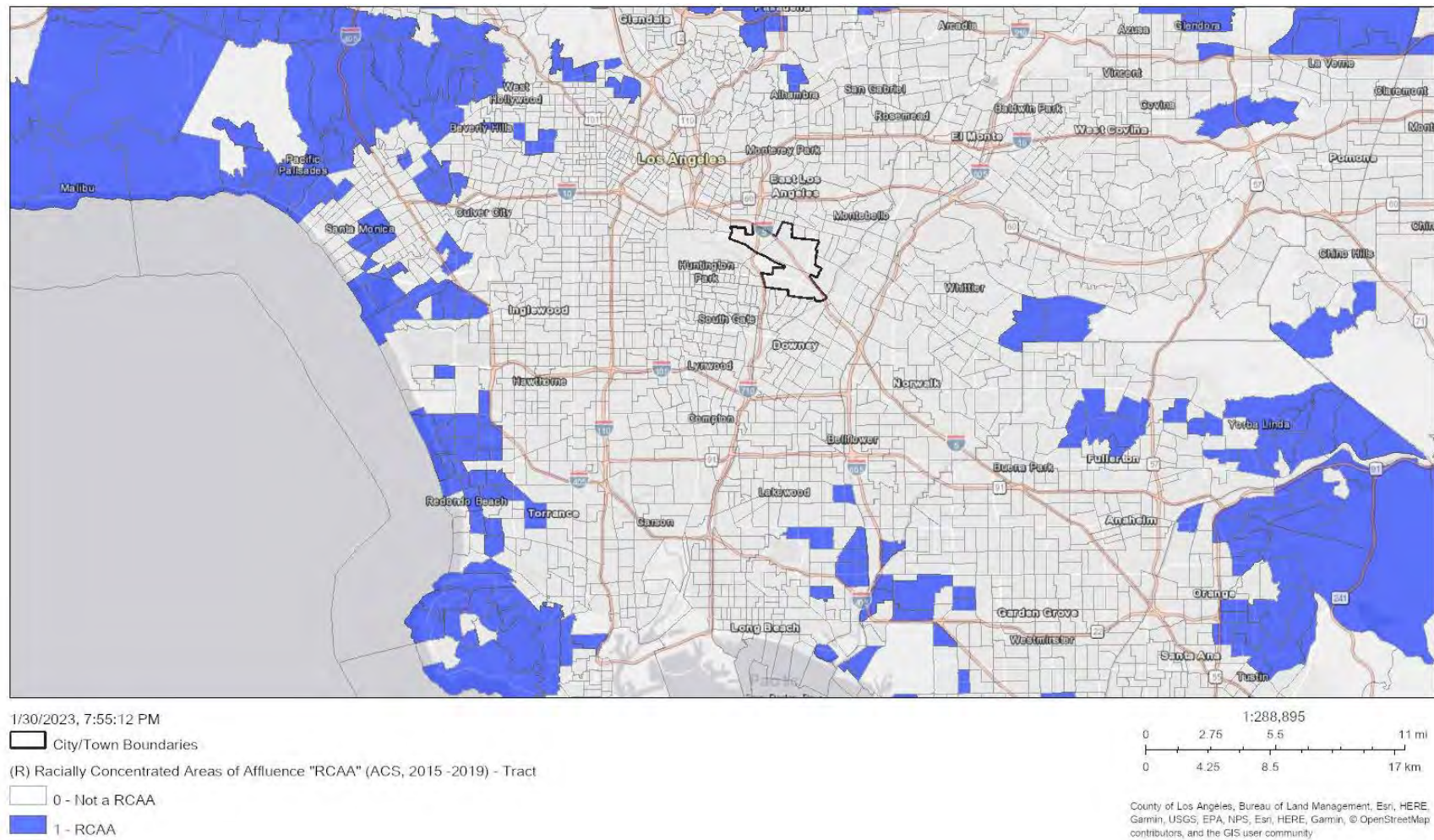
Regional Trend

As seen in Figure D-19, the RCAAs in Los Angeles County are mostly concentrated in the northwestern portion of the County (Malibu, Calabasas, Agoura Hills), San Gabriel Valley cities and along the coastline, including the cities of Santa Monica, Manhattan Beach, El Segundo, Palos Verdes Estates and Rolling Hills Estates.

Local Trend

No RCAAs are located within the City of Commerce.

Figure D-19: Regional RCAAs



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022.

Access to Opportunities

To assess fair access to opportunities regionally and locally, this analysis uses HUD Opportunity Indicators and TCAC Opportunity Area Maps. This section also specifically addresses economic, education, environmental, and transportation opportunities.

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. HUD only provides indicator scores for jurisdictions receiving CDBG funding. Because Commerce receives CDBG funds through the County, opportunity indicator scores are not available. Index scores are based on the following opportunity indicator indices (values range from 0 to 100):

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

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators related to economic, environmental, and educational opportunities and poverty and racial segregation. Based on these domain scores, tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. Table D-9 shows the full list of indicators.

Table D-9: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Poverty and Racial Segregation	Poverty: tracts with at least 30% of population under federal poverty line Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Source: California Fair Housing Task Force, *Methodology for TCAC/HCD Opportunity Maps*, December 2020.

Regional Trend

HUD Opportunity Indicator scores for Los Angeles County are shown in Table D-10. The White population, including the population below the federal poverty line, received the highest scores in low poverty, school proficiency, labor market participation, jobs proximity, and environmental health. Hispanic communities scored the lowest in low poverty and labor market participation and Black communities scored the lowest in school proficiency, jobs proximity, and environmental health. Black residents were most likely to use public transit and have the lowest transportation costs.

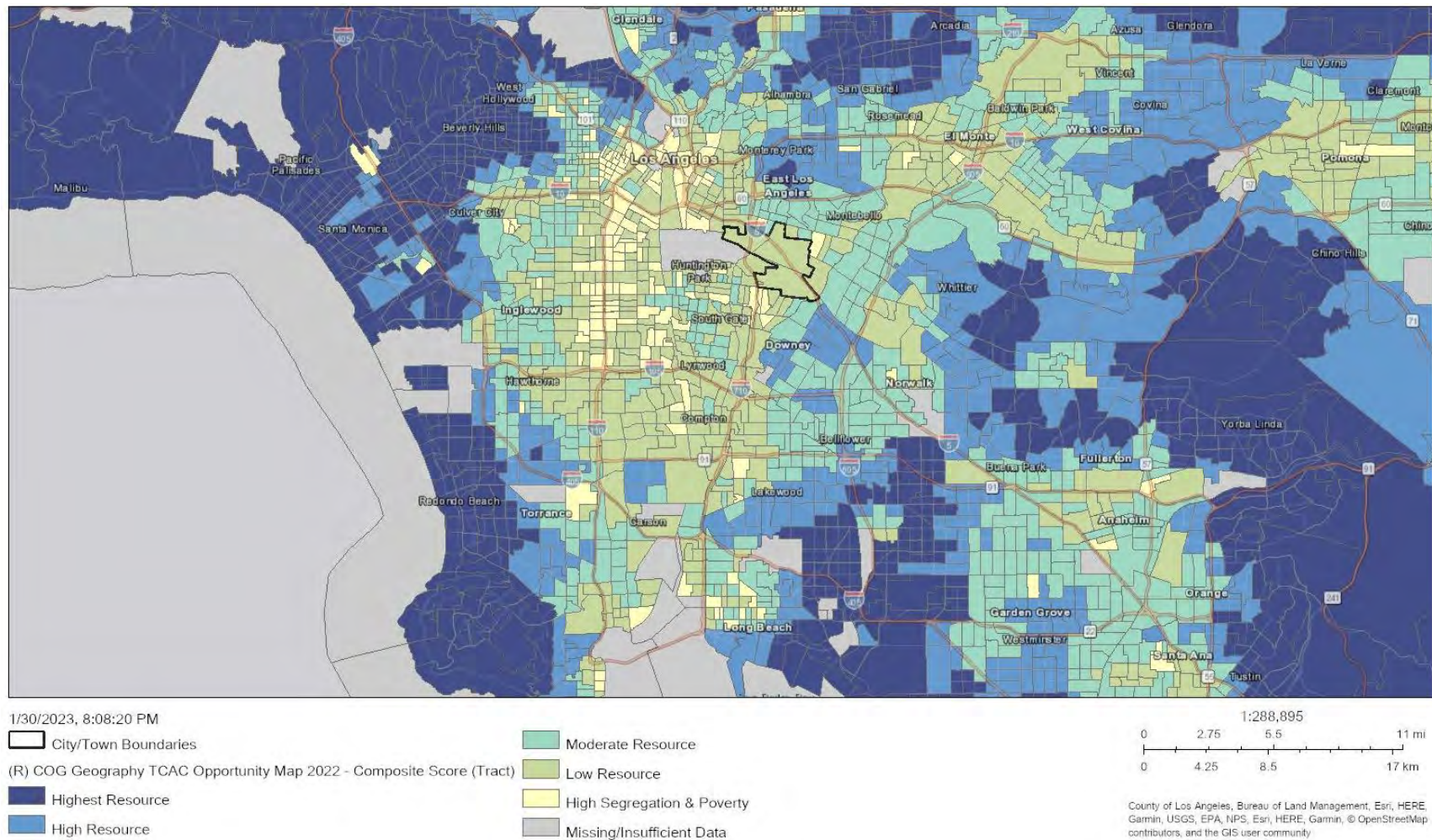
As seen in Figure D-20, the central Los Angeles County areas around the City of Los Angeles are comprised of mostly low and moderate resource tracts and areas of high segregation and poverty. The El Monte/Baldwin Park area and San Fernando area, including Van Nuys/North Hollywood, also have concentrations of low resource areas and some areas of high segregation and poverty. High and highest resource areas are mostly concentrated in coastal communities from Rolling Hills and Rancho Palos Verdes to Santa Monica, and areas in and around Beverly Hills, La Cañada Flintridge, and Pasadena/Arcadia.

Table D-10: HUD Opportunity Indicators by Race/Ethnicity – Los Angeles County

	Low Poverty	School Prof.	Labor Market	Transit	Low Transp. Cost	Jobs Prox.	Env. Health
Total Population							
White, non-Hispanic	62.59	65.09	65.41	82.63	74.09	55.80	18.99
Black, non-Hispanic	34.95	32.37	34.00	87.70	79.18	40.13	11.66
Hispanic	33.91	38.38	33.18	87.19	77.74	41.53	11.91
Asian or Pacific Islander, non-Hispanic	53.57	59.34	55.94	86.52	76.45	51.82	12.16
Native American, non-Hispanic	45.04	46.90	44.50	83.17	75.65	44.24	16.74
Population below federal poverty line							
White, non-Hispanic	50.68	58.06	57.49	86.42	79.48	57.52	16.66
Black, non-Hispanic	23.45	27.16	25.52	88.65	81.18	36.59	11.62
Hispanic	23.66	32.87	27.66	89.45	81.02	42.84	10.30
Asian or Pacific Islander, non-Hispanic	42.97	54.52	50.06	89.62	81.49	54.19	9.84
Native American, non-Hispanic	29.85	35.12	32.02	85.23	78.70	46.35	16.01

Source: HUD AFFH Database – Opportunity Indicators, 2020.

Figure D-20: Regional TCAC Opportunity Areas by Tract



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022.

Local Trend

Opportunity map categorization and domain scores for Commerce census tracts are shown in Table D-11. As seen in the table and Figure D-21, all tracts in the City have a low resource opportunity designation. Tract 2304 (portion of the city south of the railroad) has the lowest economic (0.141) and environmental (0.007) domain scores while tract 2303 (north of the railroad and east of Atlantic Blvd) has the lowest education domain score (0.104).

Table D-11: Opportunity Map Scores and Categorization for Commerce

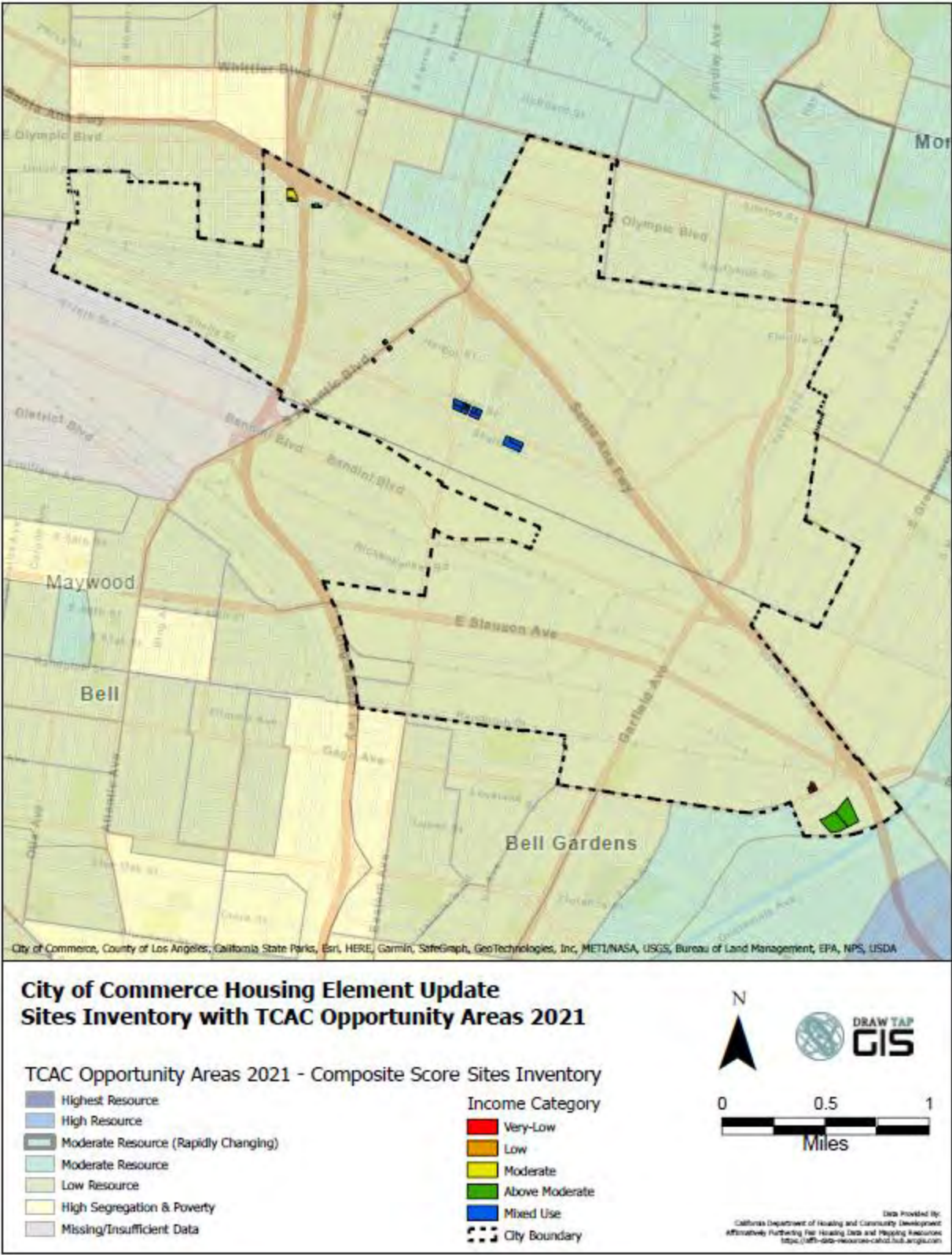
Census Tract	Economic Score	Environmental Score	Education Score	Composite Score	Final Category
6037532302	0.23	0.008	0.257	-0.775	Low Resource
6037532303	0.588	0.015	0.104	-0.595	Low Resource
6037532304	0.141	0.007	0.374	-0.807	Low Resource

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020.

Distribution of RHNA Units by TCAC Opportunity Area

All census tracts in Commerce are Low Resource TCAC Opportunity Areas. Therefore, the City's RHNA strategy does not concentrate RHNA units of any income level in any particular resource designation.

Figure D-21: TCAC Opportunity Areas and Site Inventory by Tract



Source: HCD AFFH Data Viewer (2018), 2022

Economic

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. See Table D-9 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend

As presented in Table D-10 above, in Los Angeles County, White residents have the highest labor market participation, while Hispanic residents have the lowest labor market participation. Figure D-22 shows TCAC Opportunity Map economic scores in the Los Angeles region by tract. Consistent with final TCAC categories, tracts with the highest economic scores are concentrated in coastal communities, from the Rancho Palos Verdes to Santa Monica, and areas around Beverly Hills, Pasadena, and Arcadia. Tracts with economic scores in the lowest quartile are concentrated in the central Los Angeles County areas, San Gabriel Valley cities around El Monte, and around the cities of Long Beach and Carson.

Local Trend

As described above, because Commerce receives CDBG funds through the County, opportunity indicator scores are not available. However, other information can provide insight into the City's overall TCAC Opportunity Map economic scores shown on Figure D-23:

- **Poverty:** As described in the R/ECAP section of this AFFH, Figure D-18 shows that the tract in the southern part of Commerce has a higher percentage of persons living in poverty (20 percent to 30 percent) compared to the rest of the City.
- **Employment:** The Needs Assessment of this Housing Element includes information on employment and income trends for Commerce. Residents living in the City of Commerce are employed in a diverse number of industries, with approximately 26 percent of the population employed in sales and office occupations, 23 percent in service occupations, 21 percent in management, business, science and arts occupations, 20 percent in production, transportation and material moving occupations and 10 percent in natural resources, construction, and maintenance occupations.

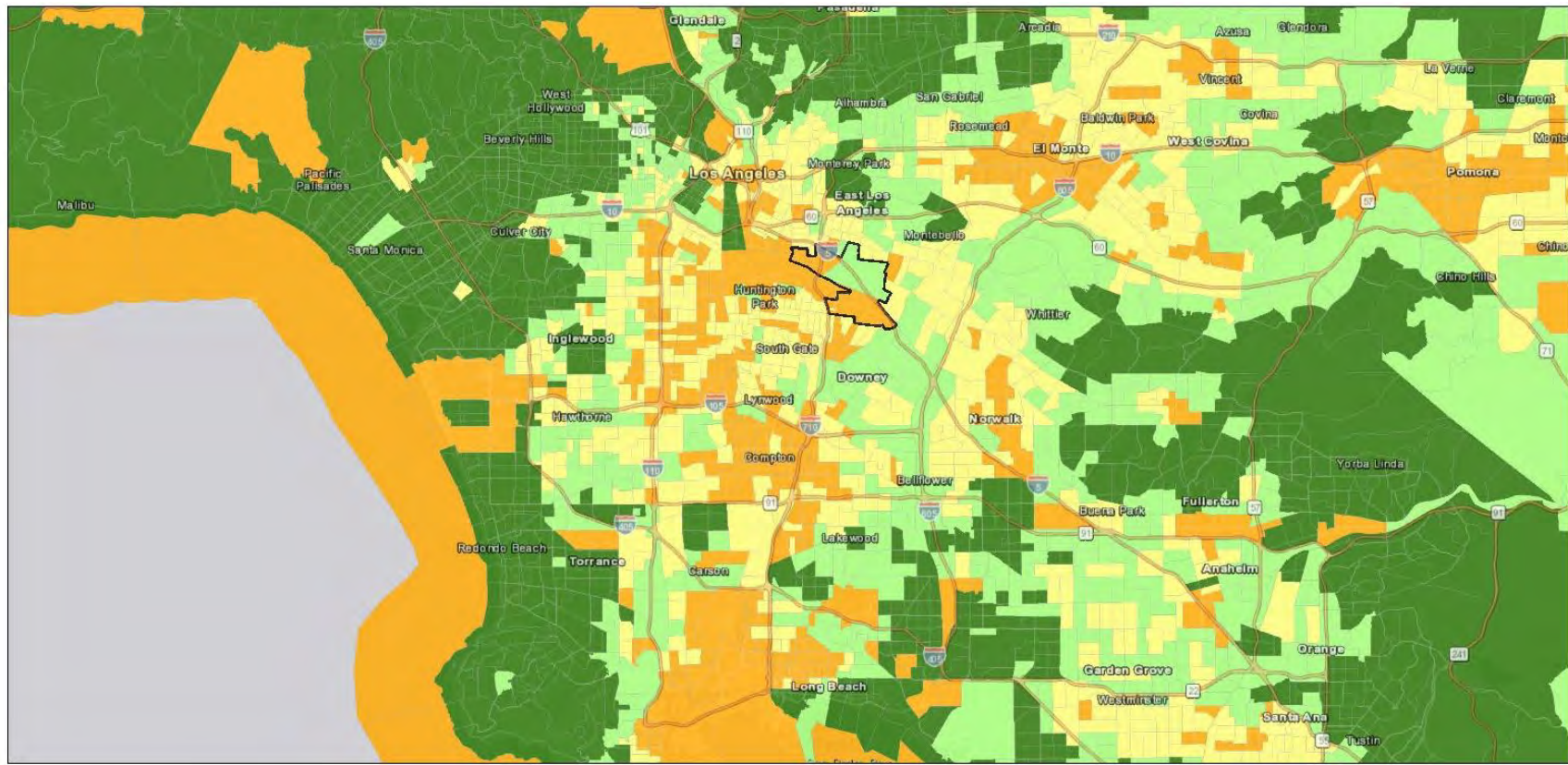
Residents employed in management, business, science, and arts occupations have the highest median annual income (\$47,604) in Commerce. Approximately one half of Commerce residents (49 percent) are employed in occupations that earn less than \$30,000 annually (Table 2-4 of the Needs Assessment Chapter).

- **Job Proximity:** Figure D-24 shows that jobs are close for residents in Commerce. Transportation to and from jobs are discussed in the Transportation section of this AFFH.
- **Median Home Values:** The Needs Assessment chapter looks at recent median home values in Commerce. In 2021, the median home value in Commerce was \$532,000 per data from Dataquick (CoreLogic).² This median home value more than doubled from 2010, when it was \$226,000, and increased by more than 200 percent compared to home values in 2000. Comparing the \$532,000 median home value with affordability levels in LA County, purchasing a home is unaffordable for all low and moderate income households in Commerce.

Table D-11 and Figure D-23 show that tract 2302 (northeast portion of the City) has a higher economic opportunity score (0.588) than the remainder of the City. The residential neighborhoods west of Atlantic Boulevard (Northwest, Bristow, Ayers and Bandini) have lower job proximity scores while the neighborhoods south of the railroad (Lanto Pacific and Veterans Park) have higher poverty rates.

² Data included in the SCAG 2021 Local Profile Dataset for Commerce.

Figure D-22: Regional TCAC Opportunity Area Economic Scores by Tract



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(R) COG Geography TCAC Opportunity Map 2022 - Economic Score (Tract)

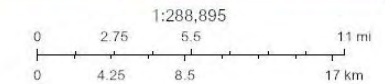
< 0.25 (Less Positive Economic Outcomes)

0.25 - 0.5

0.5 - 0.75

.75 - 1 (More Positive Economic Outcomes)

City/Town Boundaries

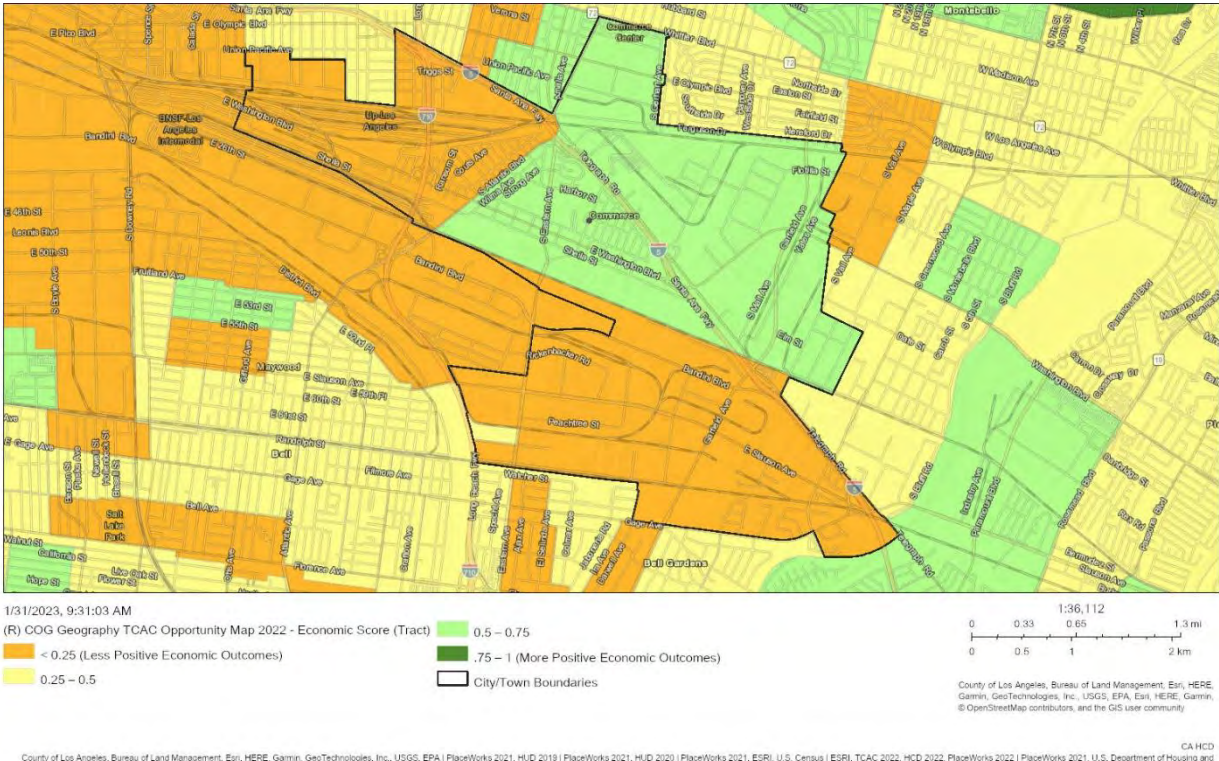


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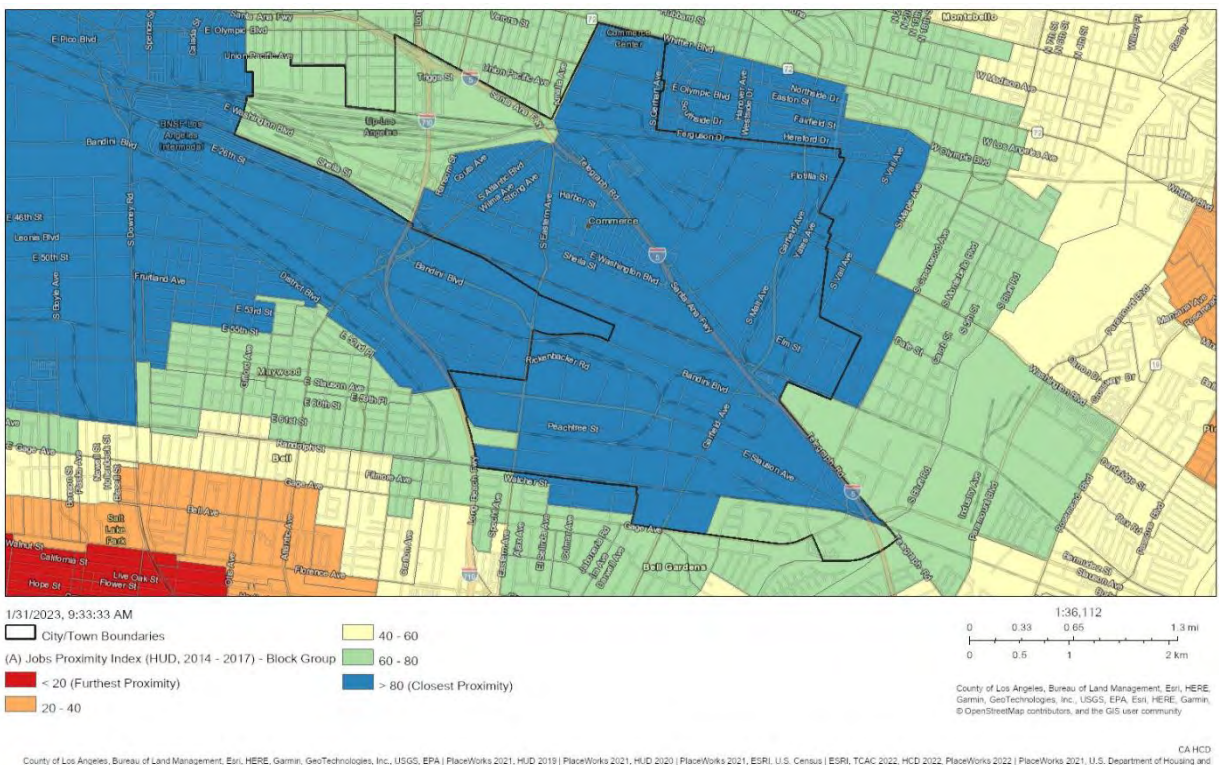
Source: HCD AFFH Data Viewer (2018), 2022

Figure D-23: Commerce TCAC Opportunity Area Economic Scores by Tract



Source: HCD AFFH Data Viewer (2018), 2022.

Figure D-24: Job Proximity in Commerce



Source: HCD AFFH Data Viewer (2018), 2022

Education

As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. See Table D-9Table D-1 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend

As presented in Table D-10 previously, White Los Angeles County communities are located closest to the highest quality school systems, while Black communities are typically located near lower quality school systems. TCAC Opportunity Map education scores for the region are shown in Figure D-25. The central County areas have the highest concentration of tracts with education scores in the lowest percentile. There is also a concentration of tracts with low education scores around the San Pedro community and City of Long Beach. Coastal communities, and areas near Arcadia, Whittier, and Beverly Hills have the highest education scores.

Local Trend

Commerce is served by the Montebello Unified School District. Bandini Elementary School (grades K through 5) is located west of Atlantic Boulevard in the Bandini residential neighborhood. Rosewood Park (grades K through 8) school is located south of the I-5 freeway, north of Harbor Boulevard and between the Village and Rosewood residential neighborhoods. High school students in Commerce attend Bell Gardens High School located in the City of Bell Gardens.

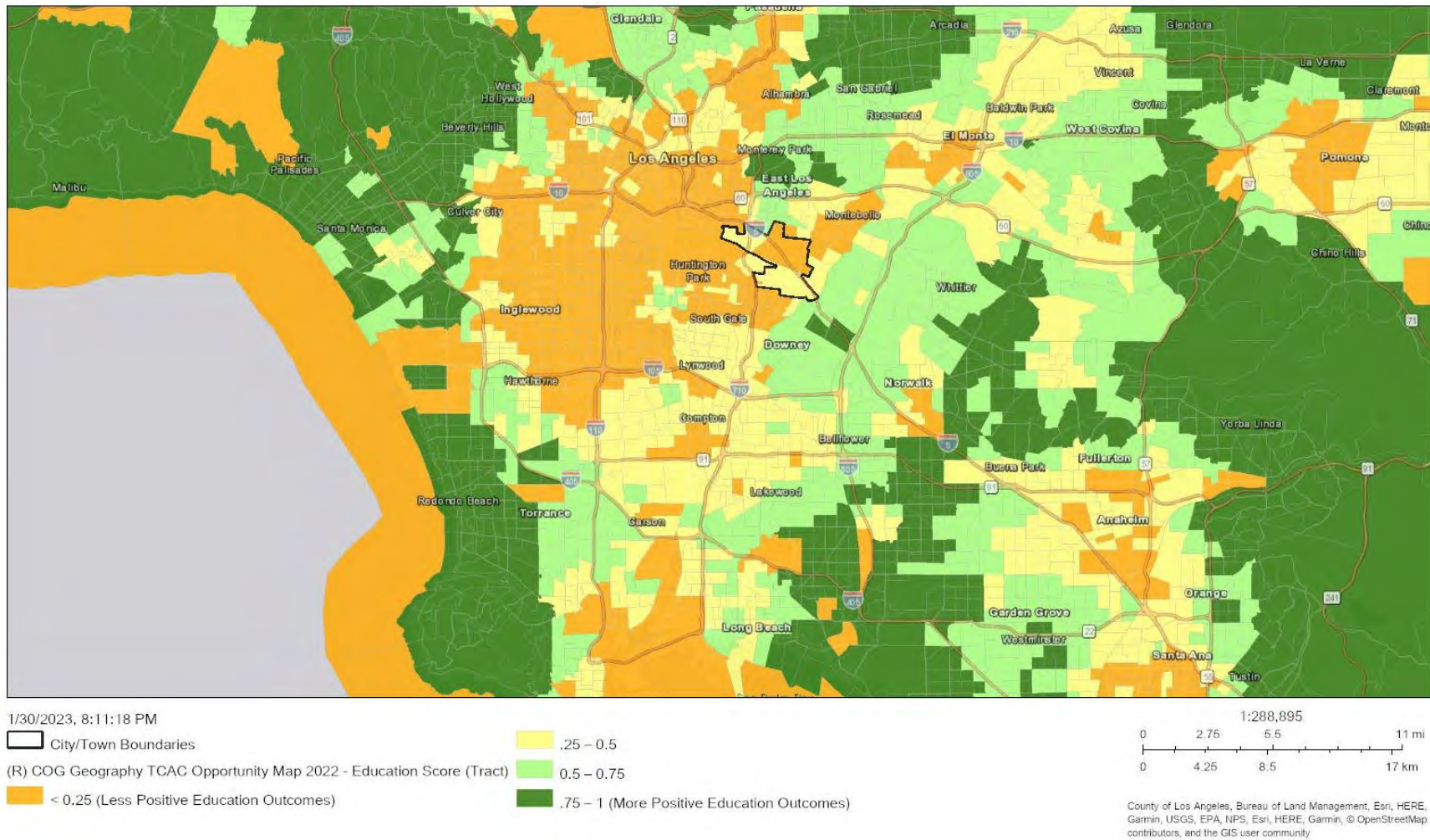
Greatschools.org is a non-profit organization that rates schools across the Country. The GreatSchools Summary Rating calculation is based on four ratings: Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average,” 5-6 indicate “average,” and 7-10 are “above average.”³ The Greatschools website had the following ratings for the schools serving Commerce students:

- Bandini Elementary School – 5
- Rosewood Park School – 4
- Bell Gardens High School - 2

The TCAC Opportunity Map education scores for Commerce are shown in Table D-11 and Figure D-26. Overall, the City has lower education opportunities (0.5 or less), with tract 2303 (including the Rosini, Village, Rosewood and Ferguson residential neighborhoods) having the least positive (< 0.25) education opportunity score.

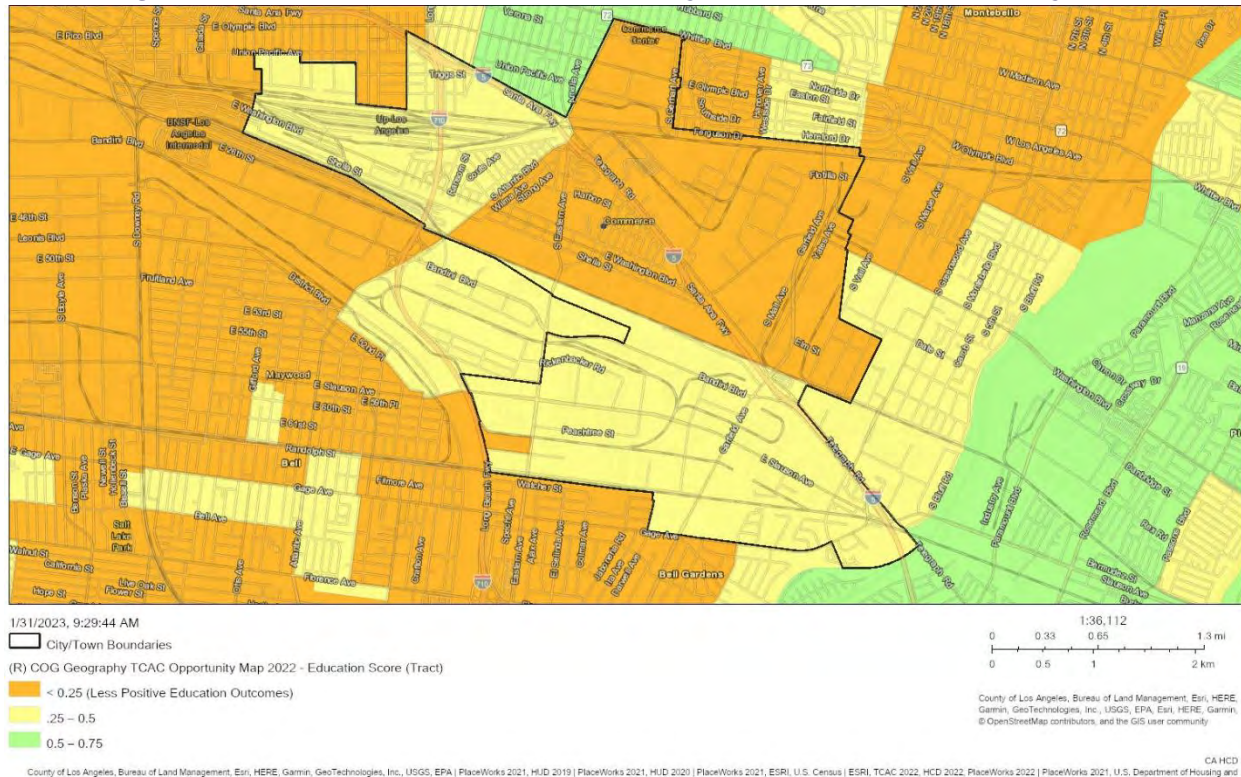
³ For more information of GreatSchools ratings, visit: <https://www.greatschools.org/gk/ratings/>

Figure D-25: Regional TCAC Opportunity Area Education Scores by Tract



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

Figure D-26: Commerce TCAC Opportunity Area Education Scores by Tract

Source: HCD AFFH Data Viewer (2018), 2022

Environmental

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to considering (1) environmental factors such as pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure and (2) sensitive receptors, including seniors, children, persons with asthma, and low birth weight infants, CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment.

Regional Trend

As seen in Table D-10, Black residents Countywide are most likely to experience adverse environmental health conditions, while White residents are the least likely. A larger proportion of Los Angeles County has environmental scores in the lowest percentile compared to economic and education scores (Figure D-27). The central Los Angeles County, San Gabriel Valley, and South Bay areas all have concentrations of tracts with environmental scores in the lowest percentile. Tracts with the highest environmental scores are in western South Bay areas (i.e., Rolling Hills and Redondo Beach), and areas around Inglewood, Altadena, Whittier, Lakewood, and Malibu.

Local Trend

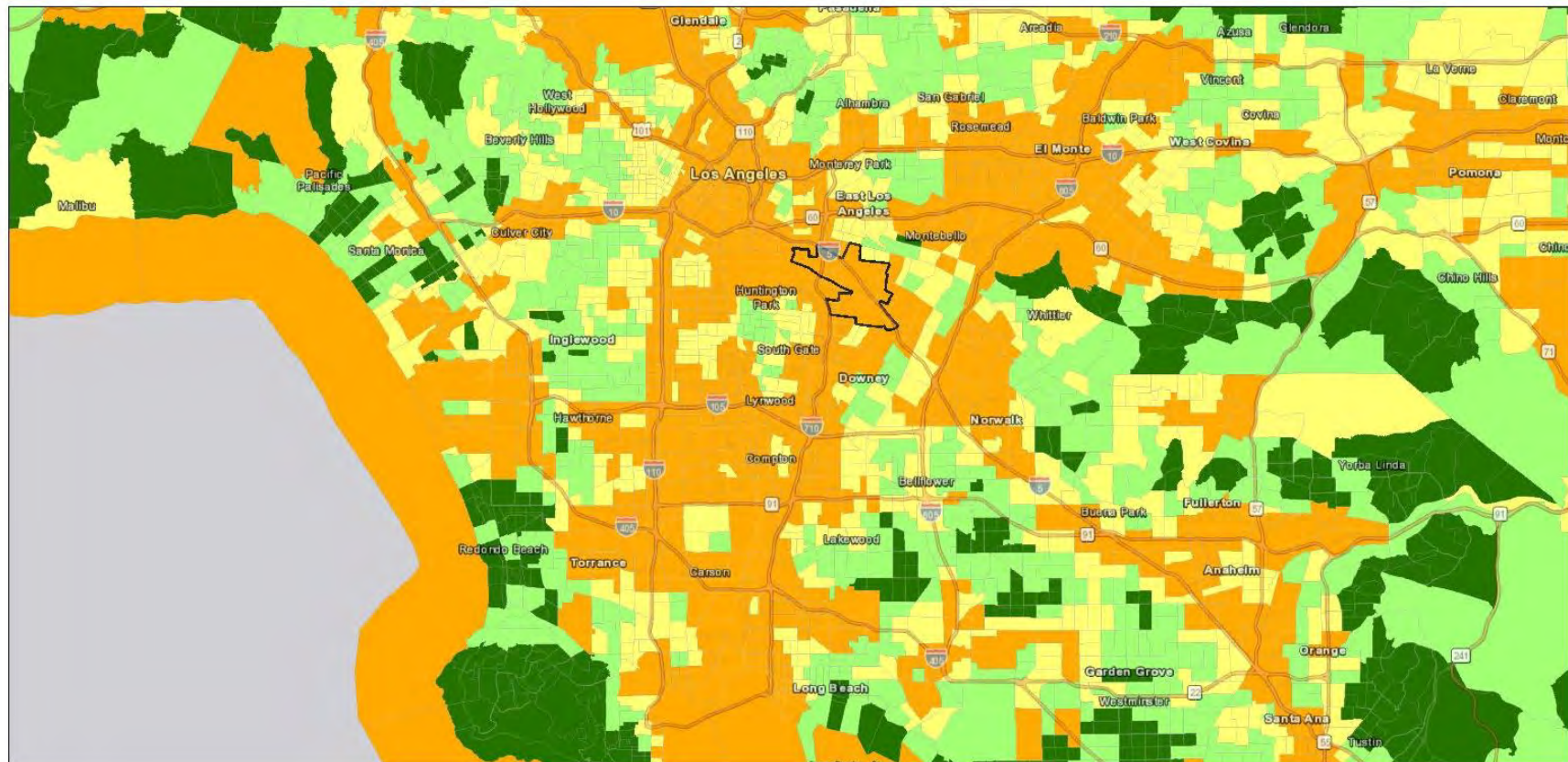
As seen in Figure D-28, all of Commerce has the least positive TCAC Opportunity Map environmental scores (<0.25). In addition, OEHHA released updated scores in February 2020 (CalEnviroScreen 4.0). The CalEnviroScreen 4.0 scores in Figure D-29 are based on percentiles and show that all tracts in Commerce have the highest (worst) scores.

Access to parks, recreation, and open space is also crucial to healthy communities. To affirmatively further fair housing, all residents, regardless of demographics, should have access to recreational areas and open space. Parks and recreational opportunities in Commerce include four neighborhood parks (two in the western portion of the city, one in the north central area and one in the southeast corner), six community centers and an aquatic center. In addition, Camp Commerce, located in Lake Arrowhead, is available to family weekends, senior citizen weekends and summer camping opportunities for Commerce residents.

Distribution of RHNA Units by CalEnviroScreen Scores

All census tracts in Commerce have the highest (worst) CalEnviroScreen 4.0 score. The City's RHNA strategy does not disproportionately concentrate RHNA units of any income level in areas with worse environmental scores.

Figure D-27: Regional TCAC Opportunity Area Environmental Scores by Tract



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City/Town Boundaries

(R) COG Geography TCAC Opportunity Map 2022 - Environmental Score (Tract)

< .25 (Less Positive Environmental Outcomes)

0.25 – 0.5

0.5 – 0.75

.75 – 1 (More Positive Environmental Outcomes)

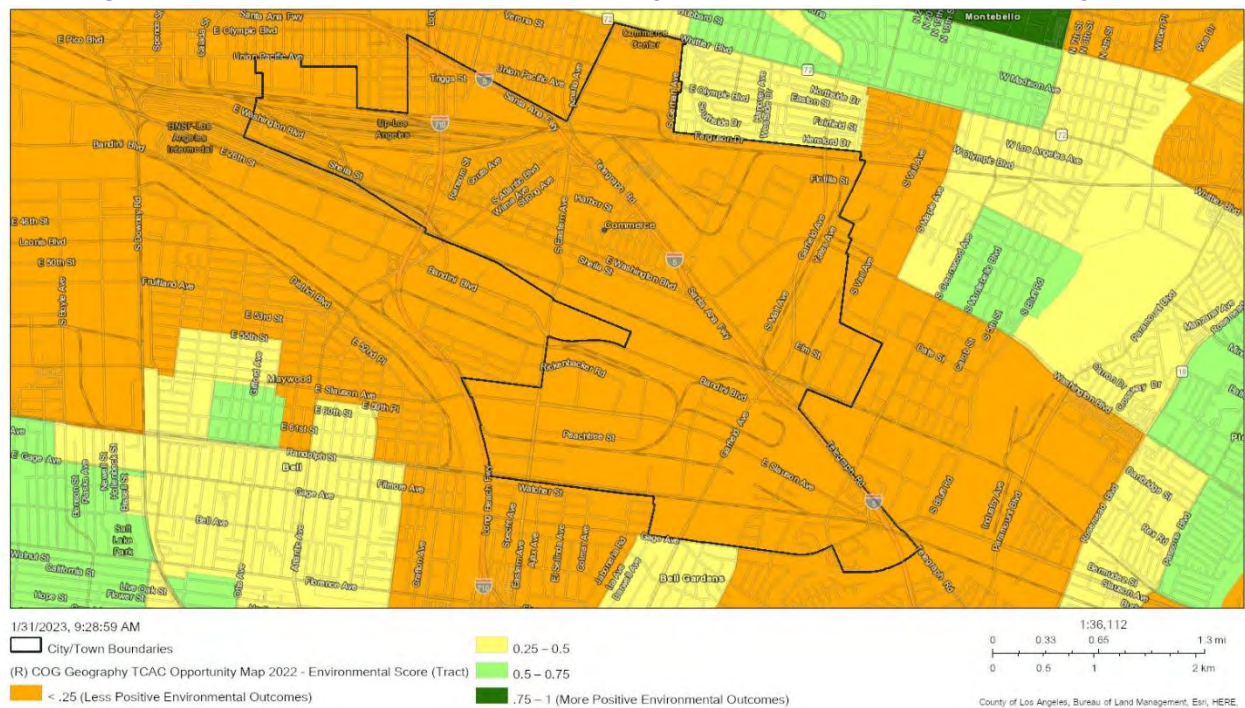
1:288,895
 0 2.75 5.5 11 mi
 0 4.25 8.5 17 km

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Source: HCD AFFH Data Viewer (2018), 2022

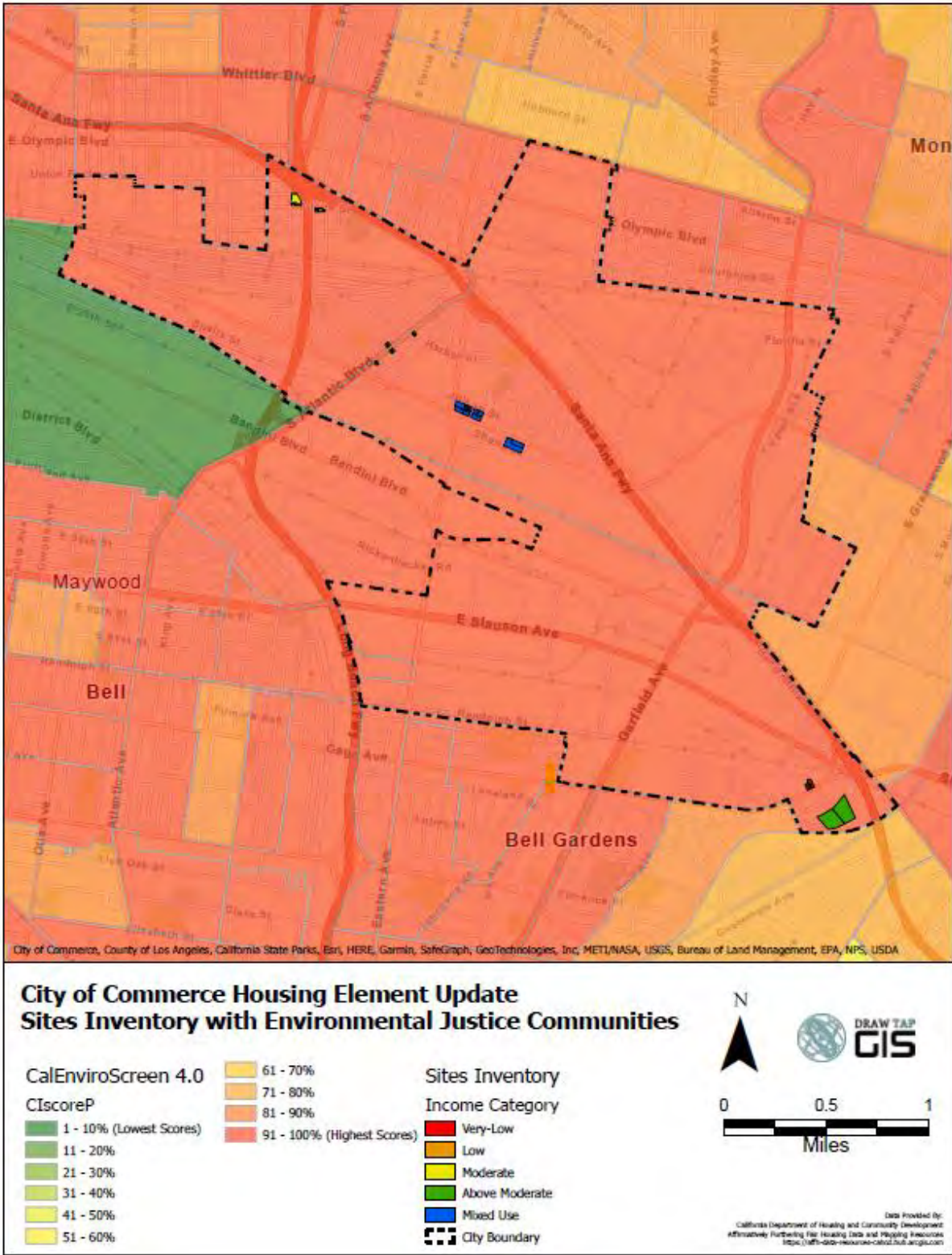
Figure D-28: Commerce TCAC Opportunity Area Environmental Scores by Tract



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and

Source: HCD AFFH Data Viewer (2018), 2022

Figure D-29: Commerce CalEnviroScreen 4.0 Scores



Source: HCD AFFH Data Viewer (2018), 2022

Transportation

Regional Trend

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. Commerce's All Transit Performance score of 7.6 is higher than Bell (7.3), Bell Gardens (6.3), Downey (6.9), Maywood (6.5), Montebello (2.8), Pico Rivera (3.9) and the County (6.8). Los Angeles County All Transit metrics are shown in Figure D-30. The County's All Transit score of 6.8 indicates a moderate combination of trips per week and number of accessible jobs enabling a moderate number of people to take transit to work. All Transit estimates 94 percent of jobs and 90 percent of workers are located within one-half mile from transit.

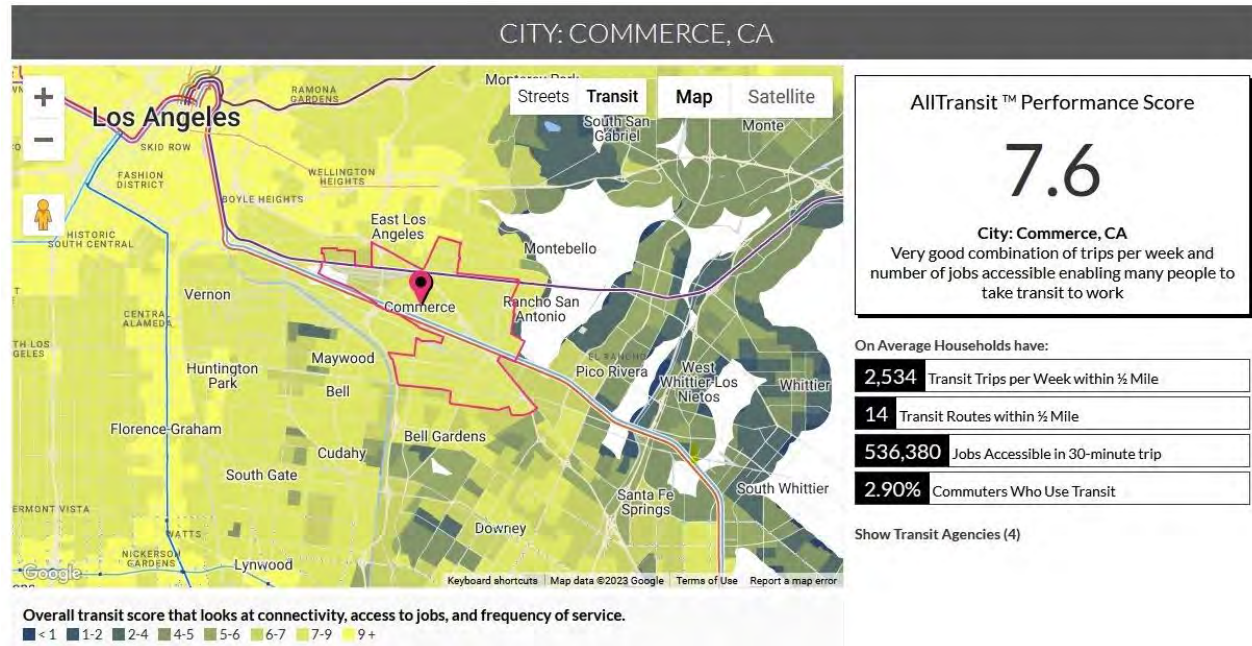
Figure D-30 : Los Angeles County AllTransit Metrics



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

Local Trend

As seen in Figure D-31, Commerce has an All Transit Performance Score of 7.6. This score reflects a very good combination of trips per week and number of jobs accessible enabling many people to take transit to work. All Transit estimates 99 percent of jobs and 99 percent of workers in Commerce are located within ½ a mile from transit.

Figure D-31: Commerce AllTransit Metrics

Source: All Transit Metrics: All Transit Performance Score – Commerce, 2019.

The following transit services are available in Commerce:

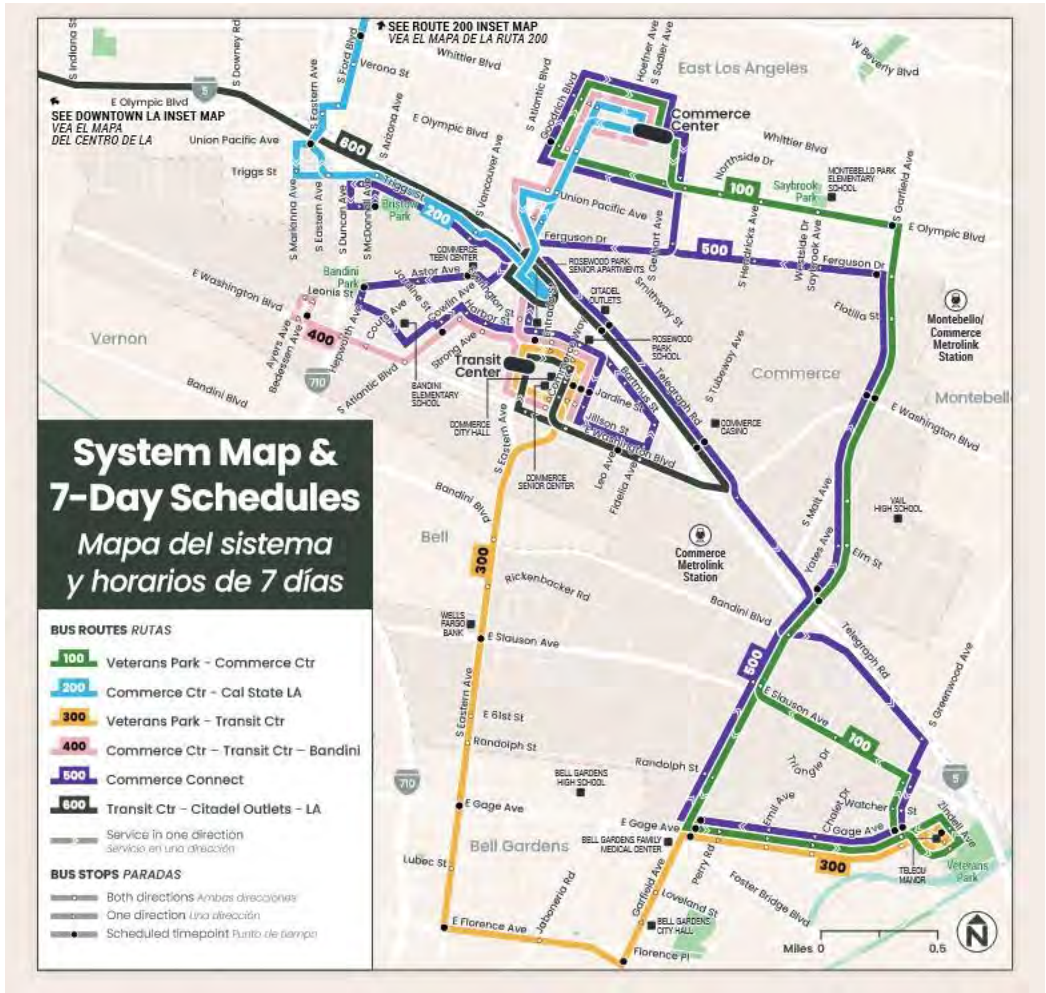
- Commerce Metrolink Station (located at 6433 26th Street, west of Garfield and north of Bandini). This station is a Metrolink Orange Line stop. The Orange Line travels between Los Angeles Union Station south through central Los Angeles County, Orange County and ending in San Diego County (Oceanside).
- City of Commerce Municipal Bus Lines: multiple bus routes travel throughout the city of Commerce and make connections to regional destinations. All transit bus services are fare free. Figure D-32 shows the transit routes in Commerce.

In February 2020, the Commerce in Motion Final Report was published by the City. The report, which included extensive public engagement, analyzed the City's transit system and developed recommendations aimed at improving access, reducing travel times and increasing ridership. The report developed a "Preferred Alternative", which included the following themes:

- Higher frequency service
- Faster, more direct service
- Bi-directional service
- Service to more locations outside of the City of Commerce
- Improved, consistent weekend service

One strategy from the Commerce in Motion Report that has been implemented is an on-demand connection service to the Commerce Metrolink Station. The new Micro Transit allows people to call and arrange for a ride to the Metrolink Station rather than waiting for a fixed route shuttle.

Figure D-32: City of Commerce Transit Routes



Source: City of Commerce Transportation Department, 2023.

Disproportionate Housing Needs

The AFFH Rule Guidebook defines ‘disproportionate housing needs’ as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area” (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Seaside. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30% of gross income; or
- Severe housing cost burden, including utilities, exceeding 50% of gross income
- Overcrowded conditions (housing units with more than one person per room)
- Units with physical defects (lacking complete kitchen or bathroom)

According to CHAS data based on the 2015-2019 ACS (the most recent dataset available), approximately one half of Los Angeles County and Commerce households experience housing problems. In both the County and City, renters are more likely to be affected by housing problems than owners.

Cost Burden

Regional Trend

In Los Angeles County, approximately 53 percent of renter households experience cost burden compared to 34 percent of owner households (Table D-12). Black or African American households face the highest rates of overall cost burden (52 percent) as well as owner-occupied and renter-occupied cost burden (40 percent and 59 percent, respectively). White and Pacific Islander households experience the lowest rate of owner-occupied cost burden (31 percent) and Pacific Islander households also have the lowest rate of renter-occupied cost burden (45 percent).

Figure D-33 and Figure D-34 show concentrations of cost burdened owners and renters by tract for the region. Tracts with high concentrations of cost burdened owners are generally dispersed throughout the County. Overpaying owners are most prevalent in the central County areas, in the westside cities of Santa Monica and Beverly Hills, and parts of the San Gabriel Valley. Most of the tracts around Commerce range from 20 percent to 60 percent cost burdened owners. There is a higher concentration of cost burdened renters countywide. More than 40 percent of renters overpay for housing in most Los Angeles County tracts. Tracts where more than 60 percent of renters are cost burdened are most concentrated in the central County areas around Inglewood and the City of Los Angeles, Long Beach, eastern County cities including Norwalk, and parts of the San Gabriel Valley.

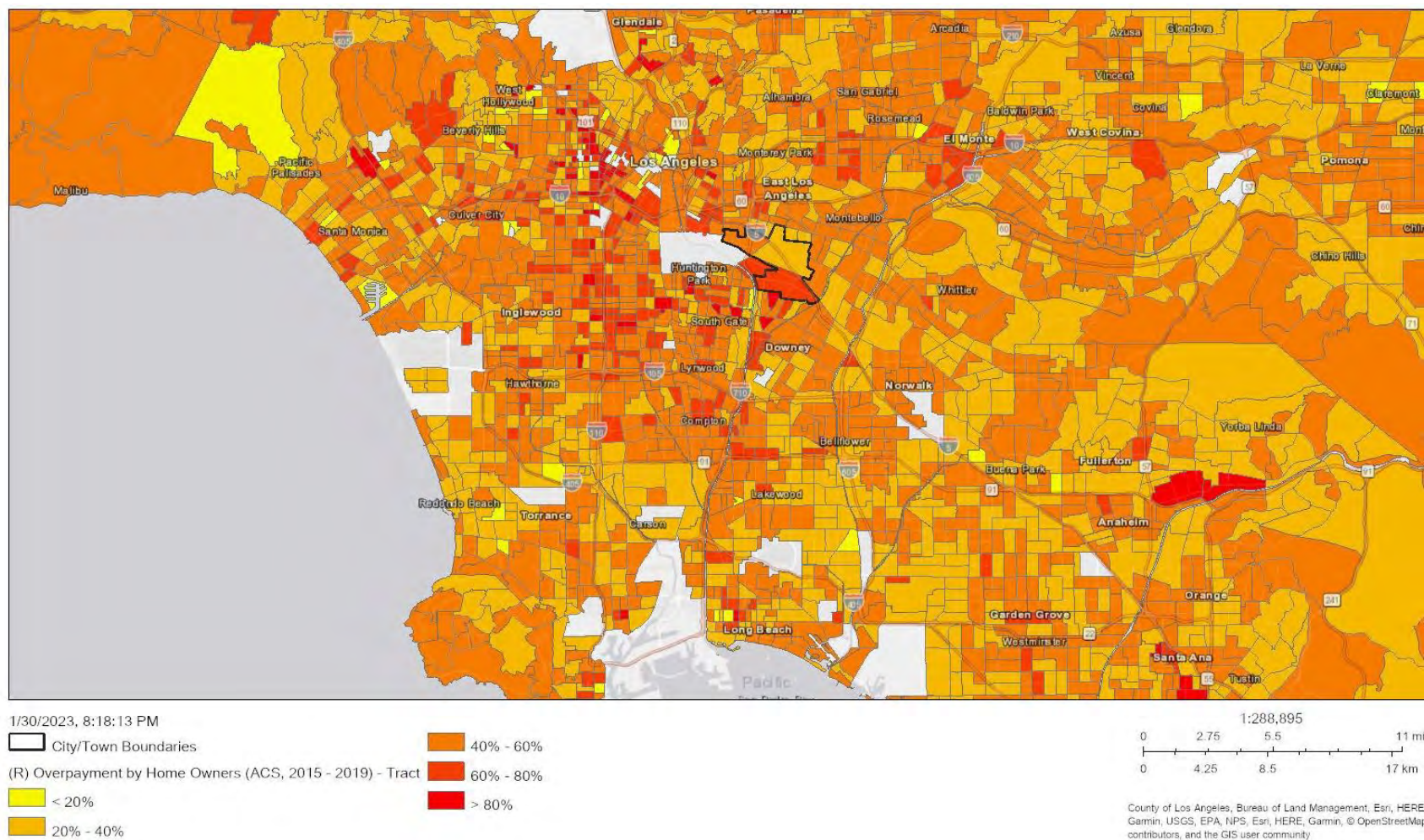
Table D-12: Los Angeles County Housing Problems By Race

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With Housing Problem							
Owner-Occupied	31.7%	41.3%	36.7%	34.7%	41.6%	45.8%	37.8%
Renter-Occupied	51.9%	62.7%	56.1%	56.1%	54.0%	69.4%	61.2%
<i>All Households</i>	41.0%	55.5%	45.7%	47.0%	49.5%	60.3%	50.5%
With Cost Burden >30%							
Owner-Occupied	30.7%	39.8%	33.0%	33.1%	31.0%	36.7%	33.7%
Renter-Occupied	48.6%	58.8%	47.3%	51.3%	45.3%	56.1%	52.8%
<i>All Households</i>	38.9%	52.4%	39.7%	43.6%	40.1%	48.6%	44.1%

Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers. In the 2015-2019 CHAS data, the "other" race category (such as multiple races) is not included.

Source: HUD CHAS, (2015-2019).

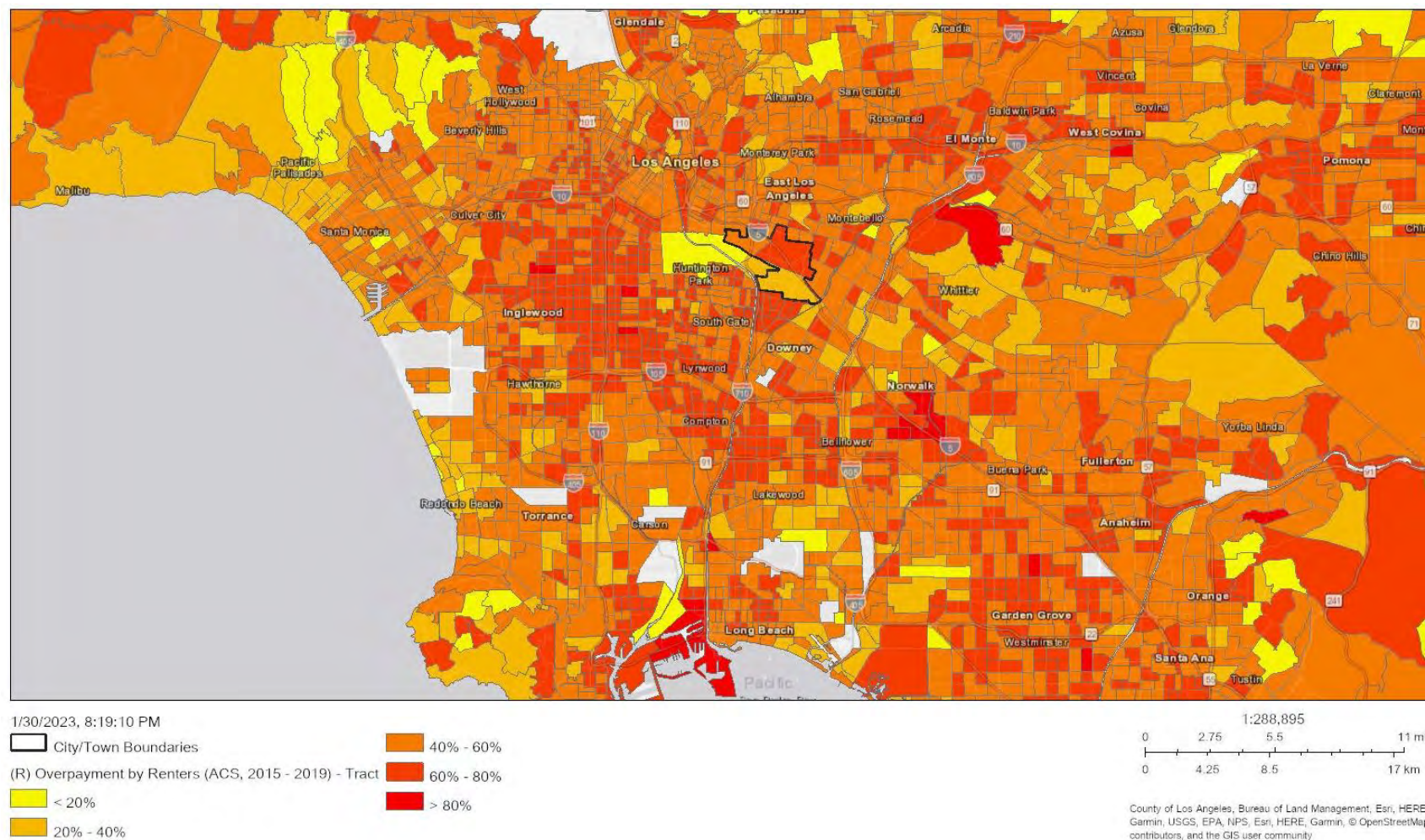
Figure D-33: Regional Cost Burden - Owners



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

Figure D-34: Regional Cost Burden - Renters



CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

Local Trend

Table D-13 shows housing problems, including cost burden, in Commerce. Over half (55 percent) of renter households experience housing problems in the city. Approximately 46 percent of these households cost burdened. A smaller percentage of owner households have housing problems (45 percent), including cost burden (35 percent). All American Indian and Alaska Native households in Commerce are cost burdened. Approximately 55 percent of White owner households and 20 percent of renter households face cost burden. A greater percentage of Hispanic renter households are cost burdened compared to owner households (47 percent and 34 percent, respectively). No Black or African American or Asian households face housing problems or cost burden in the city.

Table D-13: Commerce Housing Problems By Race

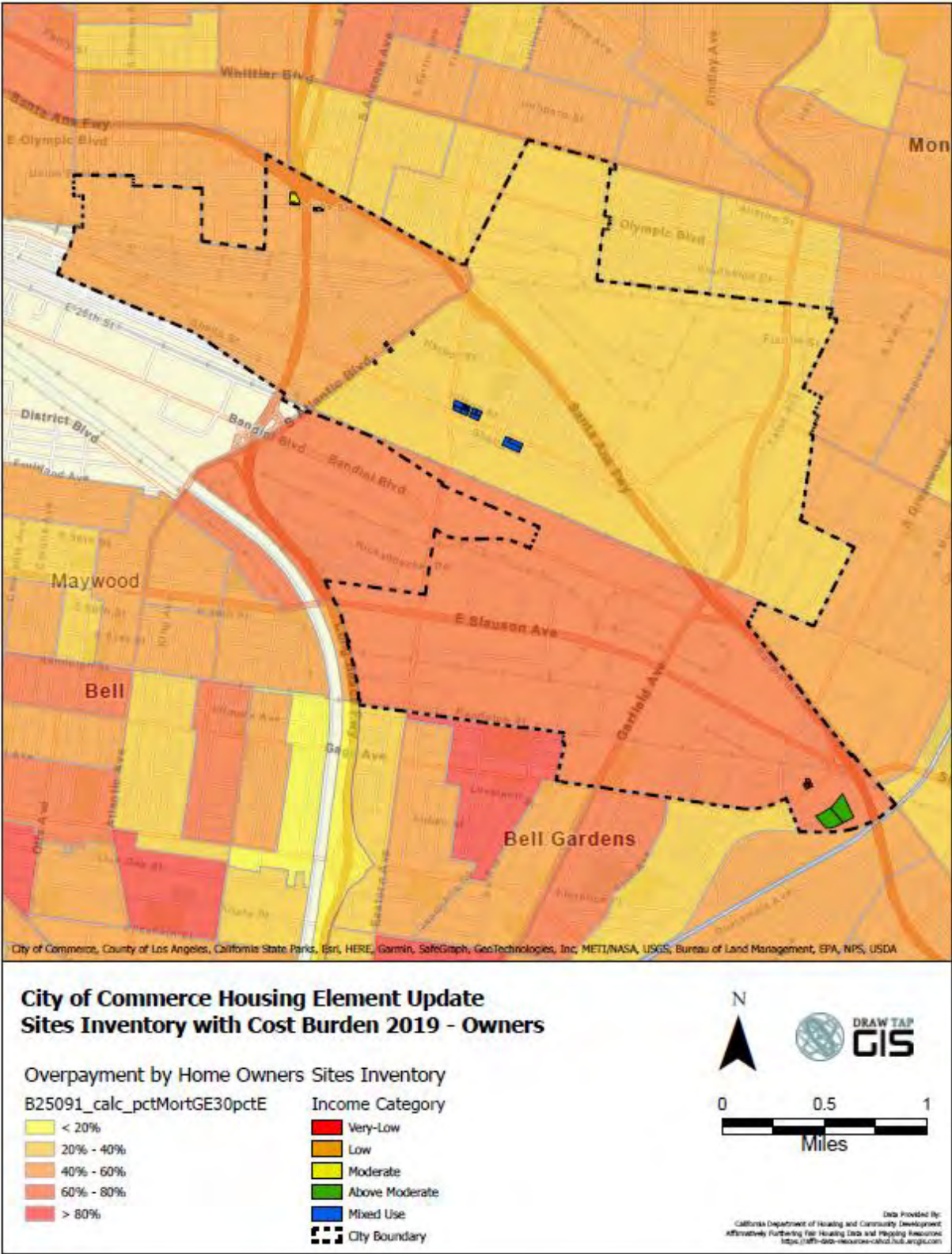
	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	All
With Housing Problem							
Owner-Occupied	56.3%	---	0.0%	100%	---	44.4%	44.6%
Renter-Occupied	40.0%	0.0%	---	---	---	57.5%	55.7%
<i>All Households</i>	53.0%	0.0%	0.0%	100%	---	51.5%	50.5%
With Cost Burden >30%							
Owner-Occupied	55.0%	---	0.0%	100%	---	34.0%	35.2%
Renter-Occupied	20.0%	0.0%	---	---	---	47.2%	45.7%
<i>All Households</i>	48.0%	0.0%	0.0%	100%	---	41.1%	40.8%

Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers. In the 2015-2019 CHAS data, the "other" race category (such as multiple races) is not included.

Source: HUD CHAS, (2015-2019).

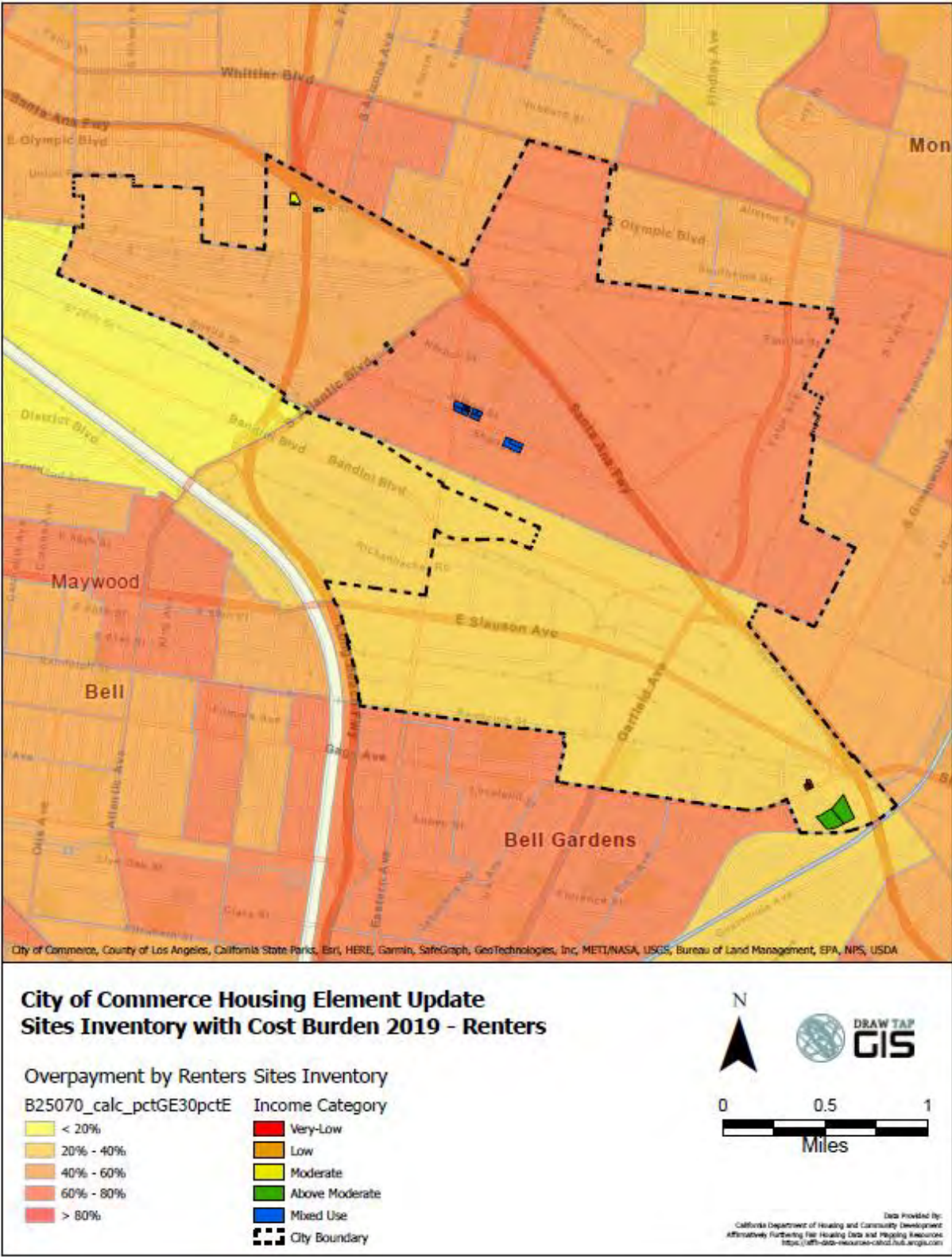
Figure D-35 and Figure D-36 shows the geographic distribution of cost burdened households in Commerce. Approximately 40 to 60 percent of owner and renter households west of Atlantic Boulevard (includes the Bandini, Ayers, Northwest and Bristow neighborhoods) experience cost burden. For households east of Atlantic Boulevard and north of the railroad (includes the Rosini, Village, Rosewood and Ferguson neighborhoods), 20 to 40 percent of owners and 60 to 80 percent of renters are cost burdened. In the area of the City south of the railroad (Lanto Pacific, Darwell and Veterans Park), 60 to 80 percent of owner households and 20 to 40 percent of renter households experience cost burden.

Figure D-35: Commerce Cost Burden and Site Inventory – Owners



Source: HCD AFFH Data Viewer (2018), 2022

Figure D-36: Commerce Cost Burden and Site Inventory – Renters



Source: HCD AFFH Data Viewer (2018), 2022

Distribution of RHNA Units by Cost Burdened Households

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units credited toward meeting the RHNA are located in the approved Modelo Specific Plan development. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175 percent of AMI). Table D-14 and Table D-15 show the unit distribution by cost burdened homeowner and renter households, respectively. Regarding homeowner cost burden, most of the lower income units (92 percent) and moderate income units (82 percent) are placed in areas with the lowest cost burden (20 to 40 percent). Thus, the RHNA is not exacerbating homeowner cost burden in Commerce. The Modelo Specific Plan provides a significant number of new units in the City, offering opportunity to moderate housing prices by addressing the shortage issues. This project will not impact the rental housing market but can assist some renters to become homeowners.

Table D-14: RHNA Unit Distribution by Cost-Burdened Homeowner Households

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	143	92.3%	79	82.3%	102	10.5%	324	26.6%
40-60%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
60-80%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

Table D-15: RHNA Unit Distribution by Cost-Burdened Renter Households

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
40-60%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
60-80%	143	92.3%	79	82.3%	102	10.5%	324	26.6%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%

Overcrowding

A household is considered overcrowded if there is more than one person per room and severely overcrowded if there is more than 1.5 persons per room. Data from the 2016-2020 ACS and the HCD AFFH Data Viewer are used to show overcrowding in Commerce and Los Angeles County.

Regional Trend

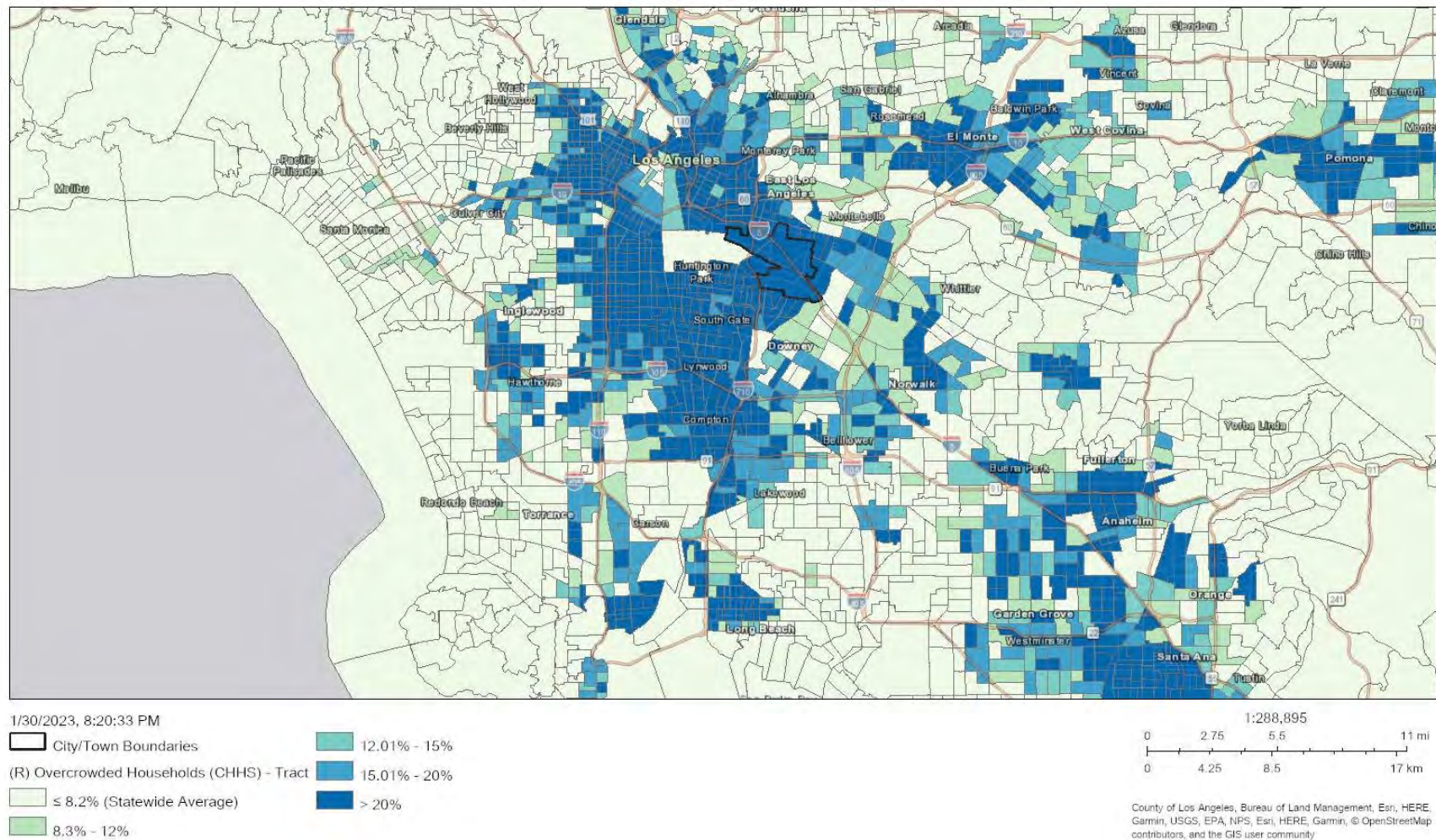
According to the 2020 five-year ACS estimates, about 11 percent of households in the County are living in overcrowded conditions (Table D-16). This is higher than the statewide average of 8.2 percent. About 16 percent of renter households are living in overcrowded conditions, compared to six percent of owner households. In addition, approximately seven percent of renter households and two percent of owner households are living in severely overcrowded conditions (more than 1.5 persons per room).

Table D-16: Los Angeles County Overcrowded Households

	Owner-Occupied	Renter-Occupied	All Households
Overcrowded (>1 person per room)	5.7%	16.0%	11.2%
Severely Overcrowded (>1.5 persons per room)	1.6%	7.4%	4.7%
Total Households	1,534,472	1,798,032	3,332,504

Source: 2016-2020 ACS, Table B25014

Figure D-37 shows concentrations of overcrowded households by tract regionally. Overcrowded households are most concentrated in the central County areas, including the City of Los Angeles, South Gate, and Compton, and in parts of the San Gabriel Valley. Commerce and areas around the City have concentrations of overcrowded households greater than 20 percent. This includes Bell, Bell Gardens, Maywood, Huntington Park and unincorporated County areas.

Figure D-37: Regional Overcrowded Households by Tract

CA HCD
 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

Source: HCD AFFH Data Viewer (2018), 2022

Local Trend

As seen in Table D-17, approximately 16 percent of Commerce residents are living in overcrowded conditions. This is higher than the County (11 percent) and statewide average (8.2 percent). Nineteen percent of renter households in Commerce are overcrowded compared to 13 percent of owner households. Severe overcrowding impacts eight percent of renter households and one percent of owner households in the City.

Table D-17: Commerce Overcrowded Households

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

Source: 2016-2020 ACS, Table B25014

Distribution of RHNA Units by Overcrowded Households

Since Commerce has lower median incomes compared to the region, the City has been allocated a larger proportion of above moderate income RHNA as a balancing strategy. A large percentage of the units credited toward meeting the RHNA are within the approved Modelo Specific Plan development. For the purpose of RHNA credits, all 850 units are assigned to above moderate income level; however the development agreement commits the project to provide approximately 10 percent (85 units) for workforce housing, affordable to moderate middle income households (up to 175% percent of AMI).

Table D-18 shows the unit distribution by overcrowded households. Regarding the RHNA's income level distribution, most of the units that are not in the Modelo Specific Plan are located in areas with the largest percentage of overcrowding (>20%). This includes units in all income levels, providing additional housing opportunities for households of all incomes that may be facing overcrowding. The Modelo Specific Plan also offers large units to accommodate multigenerational living. Therefore, the City's RHNA strategy does not exacerbate the overcrowding in Commerce.

Table D-18: RHNA Unit Distribution by Overcrowded Households

	Lower Income Units		Moderate Income Units		Above Moderate Income Units		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<8.2% (State Avg)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
8.3-12%	12	7.7%	0	0.0%	850	87.9%	862	70.8%
12.1-15%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
15.1-20%	0	0.0%	17	17.7%	15	1.6%	32	2.6%
>20%	143	92.3%	79	82.3%	102	10.5	324	26.6%
Total	155	100.0%	96	100.0%	967	100.0%	1,218	100.0%



Substandard Housing

Incomplete plumbing or kitchen facilities and housing stock age can be used to measure substandard housing conditions. Data for incomplete facilities and housing age are based on the 2016-2020 ACS. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs.

Regional Trend

Less than one percent of households in the County lack complete plumbing facilities and less than two percent lack complete kitchen facilities (Table D-19). Incomplete facilities are more common amongst renter occupied households. Only 0.4 percent of owner households lack complete kitchen facilities compared to 2.6 percent of renter households.

Table D-19: Lack of Complete Facilities By Tenure in LA County

Facility Type	Owner-Occupied	Renter-Occupied	Total Households
Lacking complete kitchen facilities	0.4%	2.6%	1.6%
Lacking complete plumbing facilities	0.3%	0.6%	0.5%
Total Households	1,534,472	1,798,032	3,332,504

Source: 2016-2020 ACS, Tables B25049 and B25053

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. According to the 2016-2020 ACS data, 85 percent of the housing stock in the County was built prior to 1990, including 59 percent built prior to 1970.

Local Trend

In general, the condition of the housing stock in Commerce is good. None of the owner-occupied units in the City have substandard conditions (lacking plumbing and/or kitchen facilities) and less than one percent of renter-occupied units lack complete kitchen facilities (Table D-20). The substandard conditions in Commerce are lower than Los Angeles County.

Table D-20: Lack of Complete Facilities By Tenure in Commerce

Facility Type	Owner-Occupied	Renter-Occupied	Total Households
Lacking complete kitchen facilities	0.0%	0.9%	0.4%
Lacking complete plumbing facilities	0.0%	0.0%	0.0%
Total Households	1,933	1,570	3,503

Source: 2016-2020 ACS, Tables B25049 and B25053

Table D-21 shows the overall age of the housing stock in Commerce. Approximately 86 percent of the housing units in the City are 30 years or older, which is consistent with the County overall (85 percent). Approximately 65 percent of Commerce's housing stock is 50 years or older, which is slightly higher than the County (59 percent).

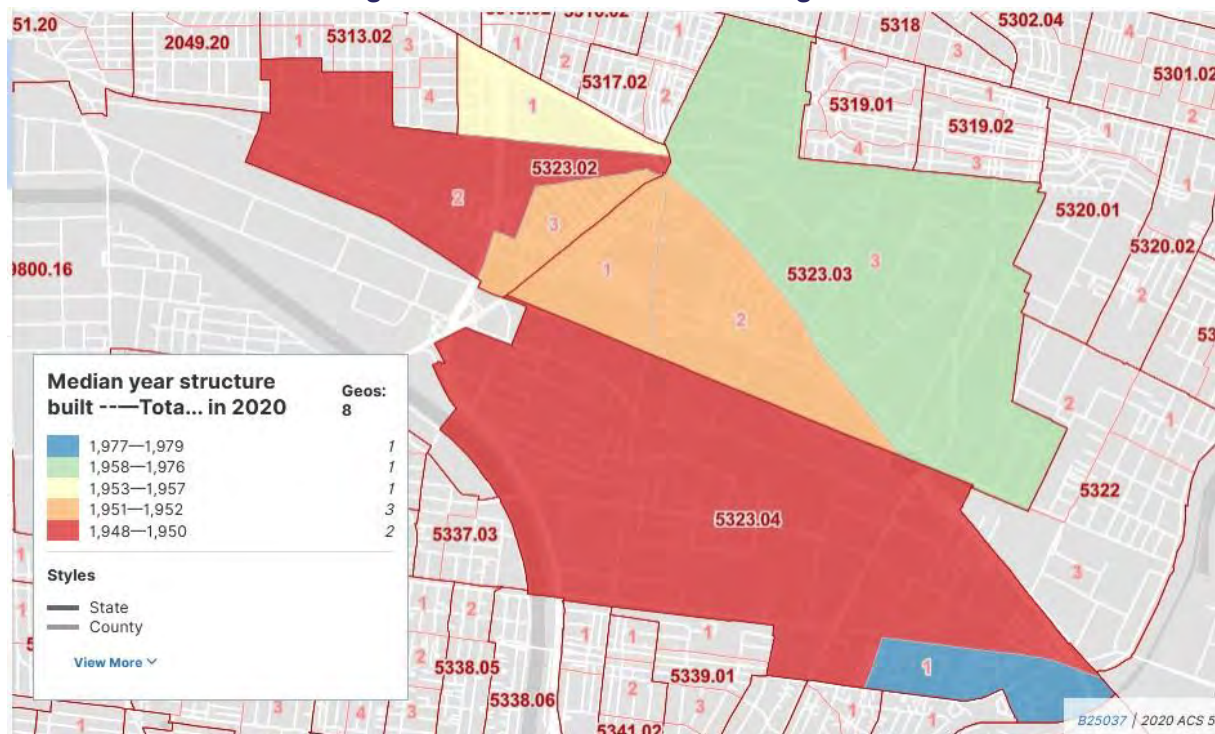
Table D-21: Housing Unit Age

Block Group	1969 or Earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or Later (<30 Years)	Total Housing Units
Block Group 1, Census Tract 5323.02	60.8%	4.9%	34.3%	329
Block Group 2, Census Tract 5323.02	88.6%	0.0%	11.4%	245
Block Group 3, Census Tract 5323.02	85.0%	3.7%	11.2%	641
Block Group 1, Census Tract 5323.03	98.5%	1.5%	0.0%	328
Block Group 2, Census Tract 5323.03	79.4%	16.7%	3.8%	754
Block Group 3, Census Tract 5323.03	22.6%	48.4%	29.0%	221
Block Group 1, Census Tract 5323.04	29.8%	49.7%	20.5%	887
Block Group 2, Census Tract 5323.04	79.5%	17.1%	3.4%	205
City of Commerce	65.4%	20.9%	13.7%	3,610

Source: 2016-2020 ACS, Table B25034

Table D-21 and Figure D-39 show that the block group on the east side of Interstate 5 and the block group in the southeastern corner of the City have a higher percentage of newer housing (30 years or newer) than the rest of Commerce.

Figure D-39: Median Year Housing Built



Source: 2016-2020 ACS

Displacement Risk

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low-income residents is above 20 percent; and
- The tract meets two of the following criteria:
 - Share of renters is above 40 percent,
 - Share of people of color is above 50 percent,
 - Share of very low-income households that are severely rent burdened households is above the county median,
 - The area or areas in close proximity have recently experienced displacement pressures (percent change in rent above County median for rent increases), or
 - Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Regional Trend

Figure C-43 shows sensitive communities at risk of displacement in the region. Vulnerable communities are most concentrated in the central County areas around the City of Los Angeles, Inglewood, South Gate, and Compton, East Los Angeles, and parts of the San Gabriel Valley. There are fewer vulnerable communities in coastal areas from Rolling Hills to Malibu.

Local Trend

As shown on Figure D-40, Commerce is identified as a sensitive community. Several of the communities surrounding Commerce are also at risk of displacement. The following includes the list of criteria for vulnerable communities that apply to Commerce:

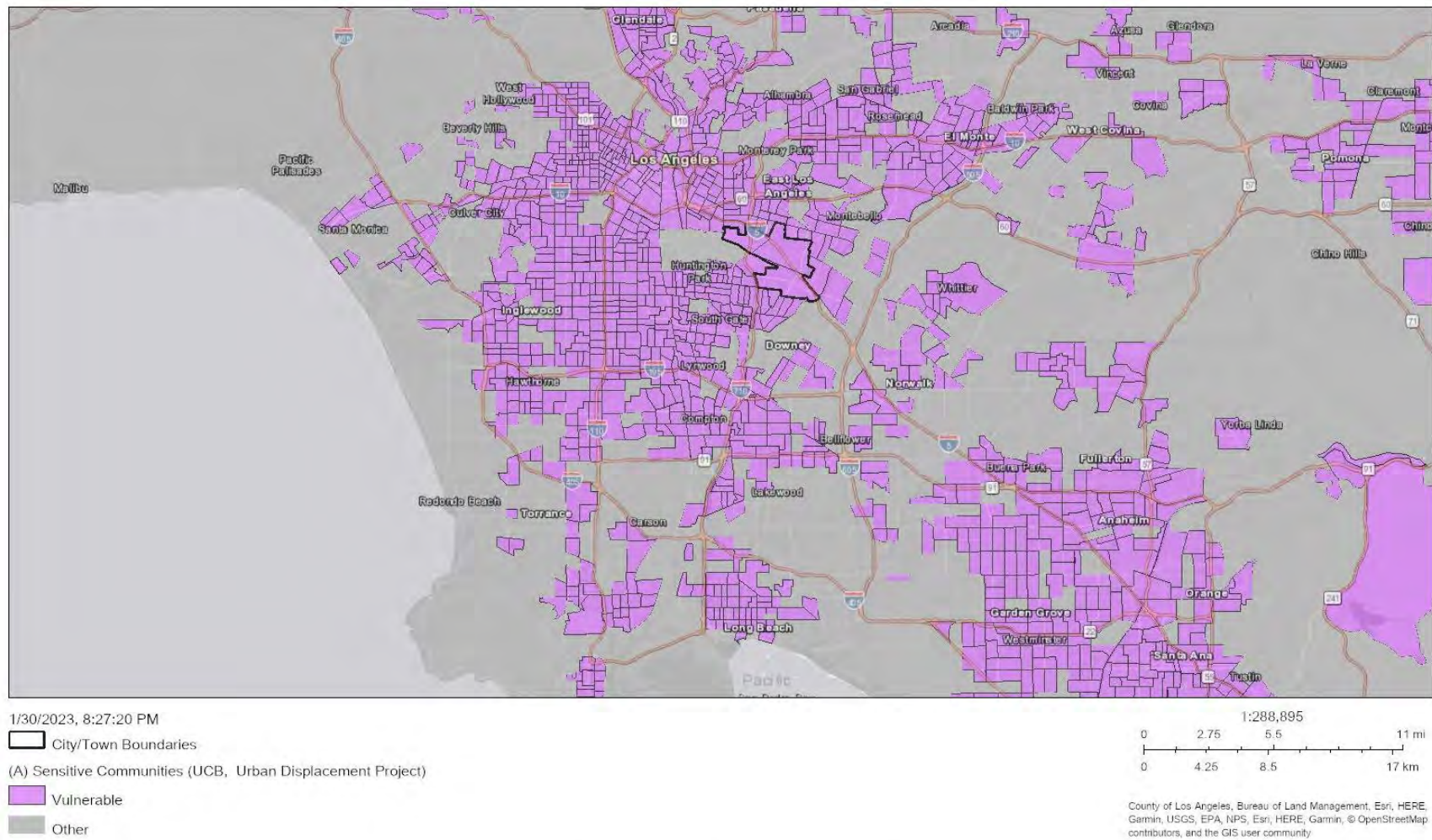
- The share of very low-income residents is above 20 percent: *According to the 2019 HUD Comprehensive Housing Affordability Strategy (CHAS) Data, approximately 52 percent of Commerce residents are considered extremely low or very low income (<50% AMI); and*

The tract meets two of the following criteria:

- Share of renters is above 40 percent: *Figure D-41 shows that a majority of Commerce households are renter households. The northern portion of the City has over 50 percent renter households while the southern portion has approximately 65 percent.*
- Share of people of color is above 50 percent: *As seen in Table D-1, 95 percent of Commerce residents are Hispanic or Latino.*
- Share of very low-income households that are severely rent burdened households is above the county median.: *This does not apply to Commerce.*

The 2019 CHAS data shows that the percentage of severely cost burdened renters is nine percent in Commerce compared to 30 percent in Los Angeles County.

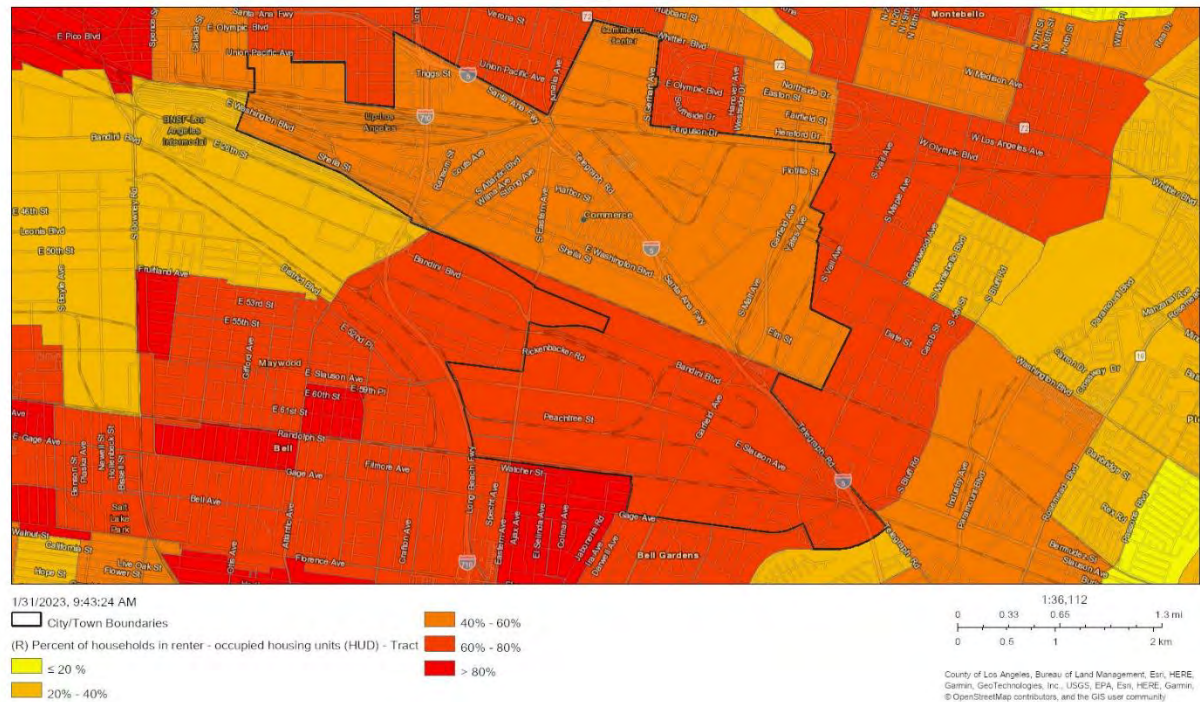
- The area or areas in close proximity have recently experienced displacement pressures (percent change in rent above County median for rent increases): *This does not apply to Commerce, as median rents in Commerce had a lower percent increase (24 percent) than the County overall (37 percent) between 2010 and 2021.*
- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap): This does not apply to Commerce as seen in Figure D-42. Commerce rents are equal to or lower than many neighboring tracts.

Figure D-40: Regional Sensitive Communities At Risk of Displacement

CA HCD
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | ESRI, TCAC 2022, HCD 2022, PlaceWorks 2022 | PlaceWorks 2021, U.S. Department of Housing and Urban

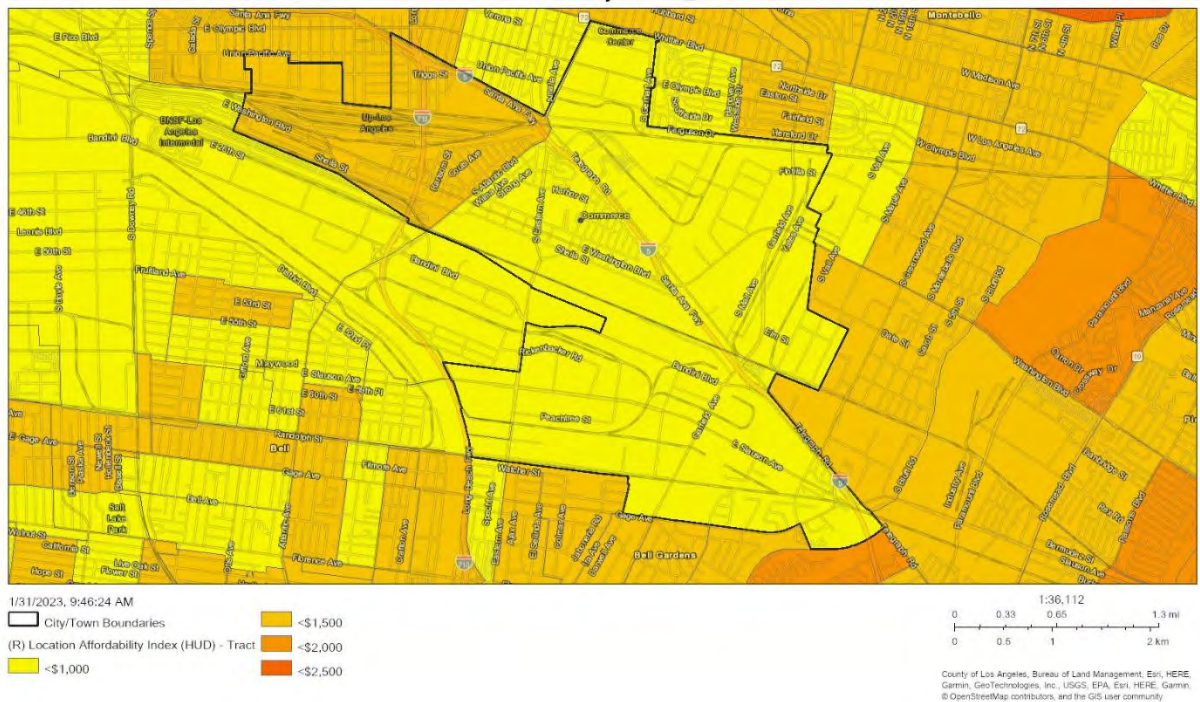
Source: HCD AFFH Data Viewer (2018), 2022

Figure D-41: Percent of Renter Households in Commerce



Source: HCD AFFH Data Viewer (2018), 2022

Figure D-42: Median Gross Rent



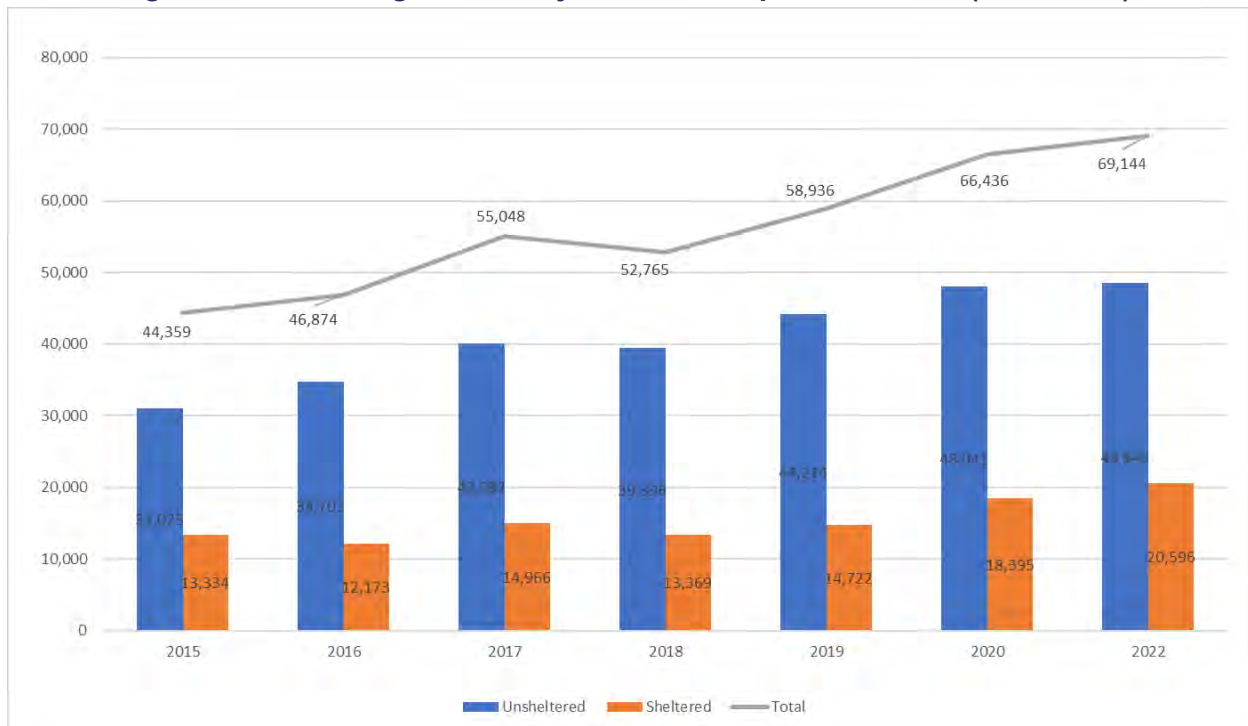
Source: HCD AFFH Data Viewer (2018), 2022

Homelessness

Regional Trend

The Los Angeles Homeless Services Authority (LAHSA) estimates there were 69,144 persons experiencing homelessness in the Los Angeles County in 2022. The Point-in-Time (PIT) count was conducted February 2022 and the data was released in September 2022.⁴ Figure D-43 shows the trends in Los Angeles County of unsheltered and sheltered individuals from 2015 to 2022. It should be noted that no count was conducted in 2021 due to the Covid pandemic. While there was an increase of approximately 2,708 persons experiencing homelessness between 2020 and 2022, the increase in unsheltered persons was only about 500. This was due to an increase in shelter beds in the County over the two-year period.

Figure D-43: Los Angeles County Homeless Population Trend (2015-2022)*



*No Point-in-Time Count was conducted in 2021 due to the Covid pandemic

Source: Los Angeles Homeless Services Authority (LAHSA), 2015-2020, 2022 LA County/LA Continuum of Care (CoC) Homeless Counts

Table D-22 shows the homeless populations in 2020 and 2022 by population type, gender, and health/disability. The largest increases in subpopulation groups were unaccompanied minors (increase of 64 percent), persons who identified as non-binary/gender non-conforming (increase of 278 percent) and persons with substance abuse disorders (110 percent). Subpopulations that saw a decrease between 2020 and 2022 were transitional

⁴ LAHSA, 2022 Greater Los Angeles Homeless County Slide Deck, September 8, 2022. www.lahsa.org

aged youth (decrease of 52 percent) and persons identifying as transgender (decrease of 36 percent).

Table D-22: Los Angeles County Homeless Population Demographics (2020, 2022)*

	2020		2022		Percent Change
	Persons	Percent	Persons	Percent	
Total	66,436	100%	69,144	100%	4%
Individuals	53,619	81%	58,251	84%	9%
Transitional Aged Youth (18-24)	4,278	6%	2,067	3%	-52%
Unaccompanied Minors (under 18)	74	<1%	121	<1%	64%
Family Members**	12,817	19%	10,893	16%	-15%
Veterans	3,902	6%	3,942	<1%	1%
People Experiencing Chronic Homelessness	25,490	38%	28,576	41%	12%
Fleeing Domestic/Intimate Partner Violence	4,356	7%	4,750	8%	9%
Gender					
Male	39,348	67%	46,016	67%	17%
Female	18,331	31%	22,294	32%	22%
Non-Binary/Gender Non-Conforming	200	<1%	755	1%	278%
Transgender	1,057	2%	678	1%	-36%
Health and Disability***					
Substance Use Disorder	7,836	13.3%	16,431	26%	110%
HIV/AIDS	1,306	2.2%	1,478	2%	13%
Serious Mental Illness	13,670	23.2%	15,499	25%	13%

*No Point-in-Time Count was conducted in 2021 due to the Covid pandemic

**Members of families with at least one child under 18.

*** Indicators are not mutually exclusive.

Source: Los Angeles Homeless Services Authority (LAHSA), 2020 and 2022 LA County/LA Continuum of Care (CoC) Homeless Counts.

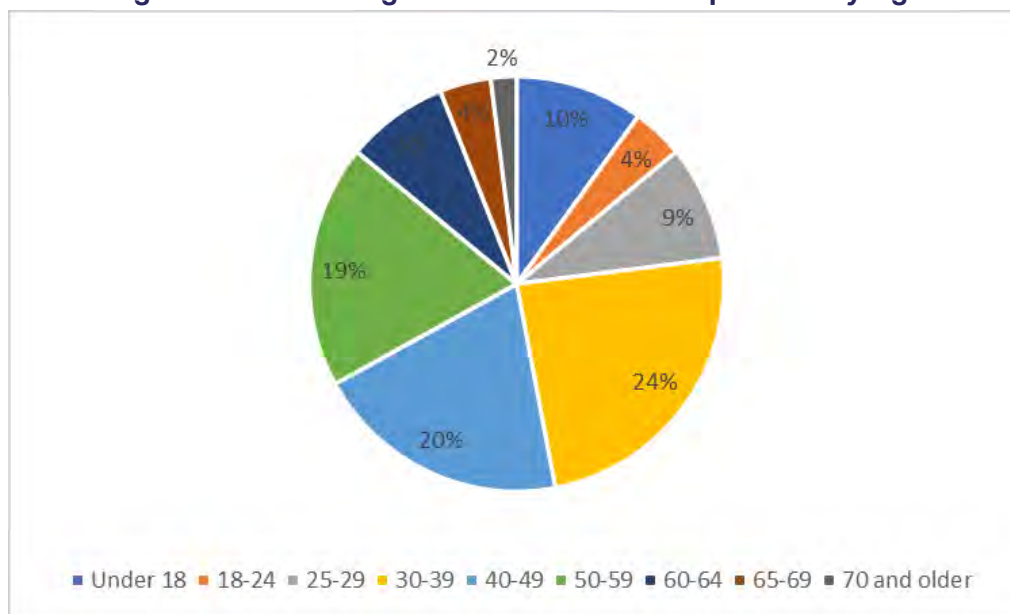
The following data refers to the Los Angeles Continuum of Care (CoC) region, covering all Los Angeles County jurisdictions except for the cities of Long Beach, Pasadena, and Glendale. Table D-23 shows the race and ethnicity of the County's homeless population in 2022 as well as the percentage in the County's overall population. Approximately 45 percent of the homeless population in 2022 were Hispanic or Latino. This group makes up one-half of the County's population overall. A disproportionate percentage of persons experiencing homelessness were Black or African American individuals. They represented 30 percent of the homeless population while only making up about nine percent of the County's population overall. Conversely, Asian residents comprise about 16 percent of the County, but less than one percent of the homeless population in 2022.

Table D-23: Race and Ethnicity of LA County CoC Homeless Population (2022)

Race / Ethnicity	Total Homeless Pop.	Prevalence in Homeless Pop. (%)	Prevalence in LA County Pop. (%)*
Hispanic/Latino	28,940	44.5%	49.1%
Black/African American (Non-Hispanic/Latino)	19,523	30.0%	9.0%
White (Non-Hispanic/Latino)	13,661	21.0%	25.3%
Mixed or Multiple races (Non-Hispanic/Latino)	1,637	2.5%	3.3%
Asian (Non-Hispanic/Latino)	598	0.9%	15.6%
American Indian/Alaska Native (Non-Hispanic/Latino)	610	0.9%	1.5%
Native Hawaiian/Other Pacific Islander (Non-Hispanic/Latino)	142	0.2%	0.4%
Total	65,111	100%	

Source: Los Angeles Homeless Services Authority (LAHSA), 2022 LA County/LA Continuum of Care (CoC) Homeless Counts

Figure D-44 shows the percentage of homeless persons by age in 2022. The largest percentage were persons age 30 to 39 (24 percent) while the lowest were persons age 70 or older (2 percent). Children (age 18 and younger) accounted for ten percent of the homeless population.

Figure D-44: Los Angeles CoC Homeless Population by Age

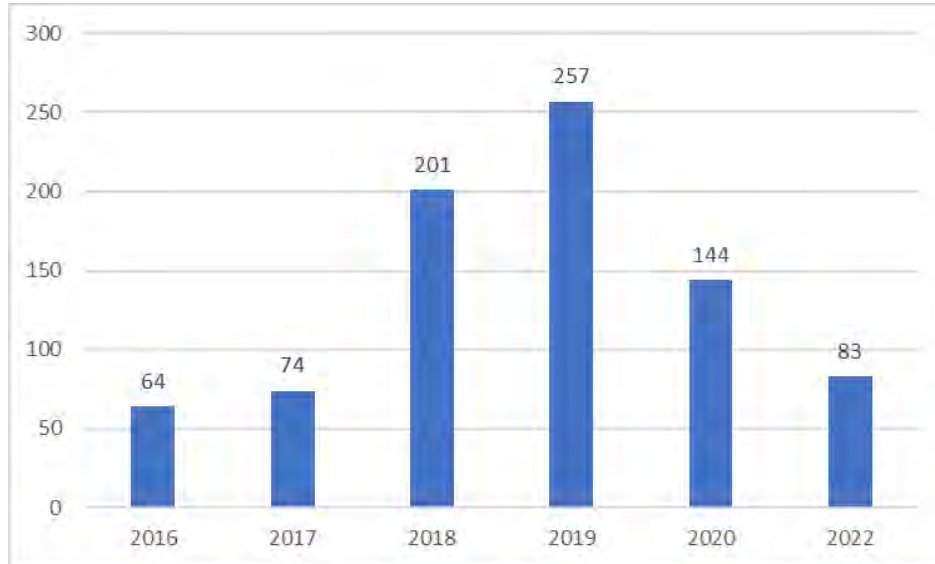
Source: Los Angeles Homeless Services Authority (LAHSA), 2022 LA County/LA Continuum of Care (CoC) Homeless Counts.

Local Trend

Los Angeles County is divided into Service Planning Areas (SPAs) and Commerce is located in SPA 7. Figure D-45 and Table D-24 show the results from the 2022 PIT Count for the City. A total of 83 unsheltered persons were counted in Commerce. This number

is lower than in the past few years, with the unsheltered homeless population peaking at 257 persons in 2019 (Figure 2-5). Of the unsheltered persons in 2022, over half (55 percent) were in some type of vehicle, such as cars, vans or RVs. Persons in makeshift shelters comprised 30 percent of those counted.

Figure D-45: Unsheltered Persons in Commerce (2016-2020, 2022)*



**No Point-in-Time Count was conducted in 2021 due to the Covid pandemic*

*Source: Los Angeles Homeless Services Authority (LAHSA),
2022 LA County/LA Continuum of Care (CoC) Homeless Counts.*

Table D-24: Unsheltered Persons in Commerce - 2022

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

*Source: Los Angeles Homeless Services Authority (LAHSA),
2022 LA County/LA Continuum of Care (CoC) Homeless Counts*

Other Relevant Factors

Historical Trends and Land Use Development

Incorporated in 1960, the City is located six miles east of downtown Los Angeles and bordered by Bell, Bell Gardens, Downey, East Los Angeles (unincorporated County), Montebello and Vernon. The City is primarily made up of industrial uses (more than 60 percent of Commerce's total land area is industrial). A major challenge for the City since

its incorporation has been the coexistence of industry near and among the area's existing residential neighborhoods.

Many of the original housing units constructed in the City were developed in the 1960s as work force housing for employees working at the various companies located in the City. Developed as separate communities, identified with specific names, residential areas in Commerce are islands surrounded on at least two sides by commercial and industrial uses creating a unique set of issues and opportunities. Following the City's incorporation, the Commerce Community Development Commission was very active in its efforts to implement a residential relocation program to move households from older industrial districts to newer residential neighborhoods. Through these efforts, the Commission was able to relocate residents living in older households in the midst of industrial areas to homes in newly established residential neighborhoods. The older, often substandard units were then demolished and the land was then used for industrial expansion. Over time, these and similar programs have eliminated many of the land use conflicts in the City.

The general nature and location of land uses has changed very little since the City incorporated. As such, Commerce was, and remains, predominantly industrial, providing employment for tens of thousands of persons living throughout the Los Angeles region. Figure D-46 shows the current zoning map, with much of the land in the City zoned for heavy industrial and commercial manufacturing land uses.

Home Loans

Home loan activity in Commerce during 2021 is available through the Consumer Financial Protection Bureau's (CFPB) Home Mortgage Disclosure Act (HMDA). Table D-25 shows the total number of applications by loan type as well as the approval and denial rates. Out of the 315 loan applications in 2021, 242 (77 percent) were for refinance loans, 51 (16 percent) were for conventional purchase loans, 18 (6 percent) were for government-backed purchase loans and four (1 percent) were for home improvement loans. The overall loan approval rate in the City was 62 percent. Conventional purchase loans had the highest approval rating at 69 percent while only one-half of home improvement loans were approved. Home improvement loans had the highest denial rate, at 50 percent. At least 20 percent of the home purchase and refinance loan applications were either withdrawn by the applicant or closed for incompleteness.

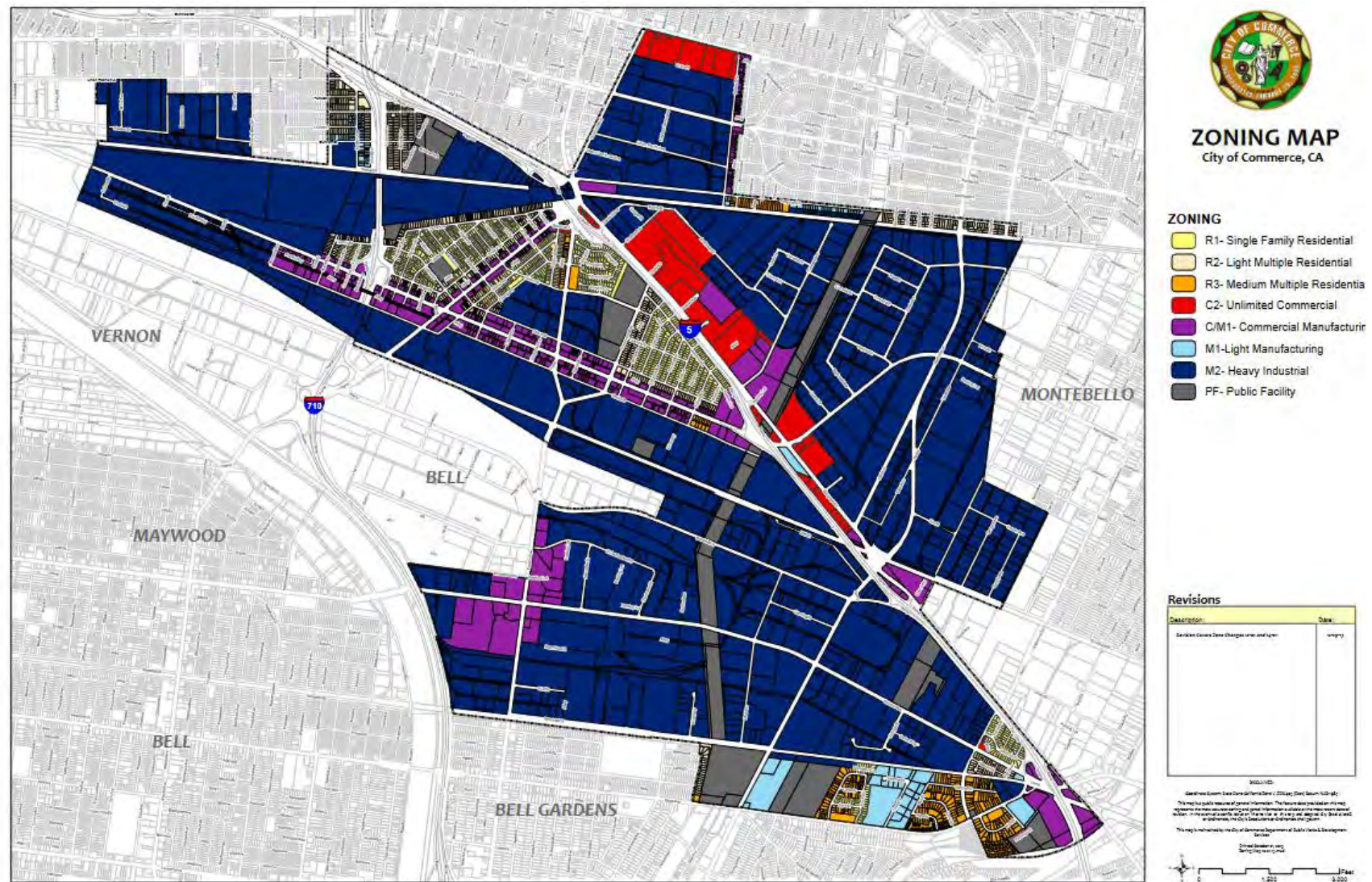
Table D-25: Disposition of Home Loan Applications in Commerce (2021)

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

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

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

Figure D-46: City of Commerce Zoning Map



Source: City of Commerce, 2023

Sites Inventory

Throughout this AFFH chapter, a sites inventory analysis was provided regarding Segregation and Integration, Environmental Conditions and Housing Problems. Figure D-47 shows the sites by income category. Very low and low income sites are located in the southeast corner of the city, moderate income sites are in the northwest, above moderate sites are in the northwest, central and southeast areas and mixed income sites (a combination of low, moderate and/or above moderate) are in the central portion of Commerce.

Table D-26 summarizes information about the number of sites inventory units and AFFH variables for the three census tracts in the City. The following section provides a detailed discussion of how the AFFH variables relate to the sites inventory for each census tract.

Figure D-47: Commerce Site Inventory By Income Category



Table D-26: Distribution of RHNA Units By Census Tract and AFFH Variable

Tract	# of HHs in Tract	Total Capacity (Units)	Income Distribution			Non-White Pop.	LMI HH Pop.	TCAC Opp. Cat.	R/ECAP?	RCAA?	Overcrowded HH	Cost Burdened Renters	Renter Pop.
			Lower	Moderate	Above Moderate								
5323.02	1,168	32	0	17	15	96.5-98.6%	68.4-83.5%	Low	No	No	15.7%	45.3%	30.4%%
5323.03	1,303	324	143	79	102	96.8-98.6%	49.0-67.1%	Low	No	No	20.6%	68.6%	45.6%
5323.04	1,032	862	12	0	850	96.6%	60.9%	Low	No	No	10.1%	29.5%	54.0%
Total		1,218	155	96	967								

Census Tract 5323.02

Census Tract 5323.02 includes the portion of Commerce west of Atlantic Boulevard. A total of 32 moderate and above moderate units are allocated to this tract. Most of the proposed sites are located in the Northwest and Bristow residential neighborhoods and currently zoned for medium and high density residential. A few sites are located on the west side of Atlantic Boulevard in the current Atlantic Mixed Use General Plan land use designation. This tract has the highest percentage of low and moderate income households in Commerce (68 to 84 percent) and lowest percentage of renter households (30 percent). However, 45 percent of renters are cost burdened. Sites in these locations have a density of 12 dwelling units per acre. During the public outreach for the General Plan Update, the Northwest and Bristow areas were identified as locations to have additional residential uses over time (GPAC Meeting #10, 11/2019). In addition, mixed use land use designations, including along Atlantic Boulevard, are integral parts of the General Plan Update. A variety of housing options were identified as a priority in the public outreach since 2018.

Census Tract 5323.03

Census Tract 5323.03 is located in central Commerce, bound by Atlantic Boulevard to the west, the railroad to the south and the city boundaries to the north and east. This tract has 49 to 67 percent low and moderate income households, the highest overcrowding rate in the City (21 percent) and almost half of the households are renters (46 percent). Of the renter households, 69 percent face cost burden issues. The sites in this tract accommodate 324 units of mixed incomes (143 lower, 79 moderate and 102 above moderate income). The sites are located along the eastern side of Atlantic Boulevard as well as along Jillson Street, Sheila Street and Washington Boulevard in the central portion of the City. The proposed sites are located in areas that will be designated for mixed land uses in the General Plan Update, providing for a variety of housing types for all income levels. The sites along Jillson are just south of the Housing Opportunity Overlay (HOO) and the Rosewood Village projects. These locations will assist in adding housing near the Commerce Transportation Center, City Hall, Library, and Rosewood Park and build walkable residential areas that were identified as important during the General Plan Update public outreach. Denser residential development was also seen as a priority during the public outreach process to provide different housing options.

Census Tract 5323.04

Census Tract 5323.04 is located in the southern part of the City with the railroad tracks serving as the northern boundary. In this tract, 61 percent of households are low or moderate income. The tract has the lowest percentage of overcrowded households in the City (10 percent), highest percentage of renter households (54 percent) and lowest percentage of renter cost burden (30 percent). The proposed sites can accommodate a total of 862 units. Of these, 850 are part of the approved Modelo Specific Plan in Veteran's Park. For the purpose of the RHNA, these units are assigned to above moderate income;

however, the development agreement commits the project to provide 10 percent (85 units) in the Specific Plan as workforce housing, affordable to middle income households (up to 175 percent AMI). The remaining proposed sites can accommodate 12 lower income units and are located along Gage Avenue adjacent to commercial and residential uses.

Summary of Fair Housing Issues

Fair Housing Enforcement and Outreach

According to HUD's Office of Fair Housing and Equal Opportunity (FHEO) records, 130 housing discrimination cases were filed in Los Angeles County in 2020, compared to 291 in 2010. In 2020, a majority of cases were related to disability (66 percent). Another 21 percent of cases were related to racial bias. The percent of cases related to disability has increased significantly since 2010, when only 36 percent of cases reported a disability bias. According to the HCD AFFH Data Viewer, there have been only two FHEO inquiries in Commerce since 2013. Both were unrelated to a specific basis of discrimination and one was found to have no valid issue.

Issue #1: Insufficient Fair Housing Testing and Limited Outreach Capacity

Currently, fair housing resources and services are not available on the City's website. Outreach to Commerce's residents can provide needed guidance for those facing fair housing issues in the City. In addition, despite outreach efforts, participation on outreach events is low. As described above, a majority of fair housing cases were related to disability (66 percent). Given that approximately 30 percent of seniors in Commerce, age 65 or older, have a disability, outreach to this group about fair housing is important.

Contributing Factors:

- Lack of fair housing testing and monitoring
- Lack of awareness of services
- Lack of a variety of media inputs

Segregation and Integration and Access to Opportunities

Issue #2: Patterns of Concentration and Disparate Economic Access to Opportunities/Resources

Overall, the City has a lower median income (\$54,639) than the County overall. Commerce also has Low TCAC composite scores in all census tracts. However, certain portions of the City face additional economic challenges:

- The northwest block group (west of Atlantic Boulevard) and the block group northeast of the Santa Ana (I-5) freeway has the highest concentration (75 to 100 percent) of low and moderate income households;

- The northwest and southern tracts have the lowest economic TCAC scores; and
- The southern tract has the highest poverty rate (20 to 40 percent) in the City.

Contributing Factors:

- Lack of access to quality schools
- Location and type of affordable housing
- Low median incomes

Issue #3: Citywide Environmental Conditions

As seen in Figure D-28, all of Commerce has the least positive TCAC Opportunity Map environmental scores (<0.25). In addition, the CalEnviroScreen 4.0 scores released in February 2020 (Figure D-29) show that all tracts in Commerce have the highest (worst) scores.

Contributing Factors:

- City's location in Los Angeles County (freeway and truck traffic); and
- Industrial and commercial manufacturing land uses within Commerce and adjacent cities.

Disproportionate Housing Needs

Issue #4: High Concentrations of Aging Housing Stock, Cost Burden, and Overcrowding

Cost burden impacts between 20 percent to 80 percent of all households in Commerce. Households in the southern part of the city face the highest owner cost burden (60 percent to 80 percent), while households east of Atlantic Boulevard and north of the railroad face the highest renter cost burden (60 percent to 80 percent).

Approximately 16 percent of Commerce residents are living in overcrowded conditions. This is higher than the County (11 percent) and statewide average (8.2 percent). Nineteen percent of renter households in Commerce are overcrowded compared to 13 percent of owner households.

Approximately 86 percent of the housing units in the city are 30 years or older, which is consistent with the County overall (85 percent). Approximately 65 percent of Commerce's housing stock is 50 years or older, which is slightly higher than the County.

The area of the City east of Atlantic Boulevard and north of the railroad track has the highest concentrations of renter cost burden and overcrowding in the City.

Contributing Factors:

- High housing and rent prices
- Availability of affordable units in a range of sizes
- Age of housing stock