

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

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May 27, 2022

Amy Bodek, Director  
Department of Regional Planning  
County of Los Angeles  
320 W. Temple St, 13th Floor  
Los Angeles, CA 90012

Dear Amy Bodek:

**RE: County of Los Angeles's 6<sup>th</sup> Cycle (2021-2029) Adopted Housing Element**

Thank you for submitting the County of Los Angeles (County) housing element adopted and received for review on May 17, 2022. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

HCD is pleased to find the adopted housing element in full compliance with State Housing Element Law (Article 10.6 of the Gov. Code). The adopted element was found to be substantially the same as the revised draft element that HCD's April 25, 2022 review determined met statutory requirements. HCD's finding was based on, among other reasons, programs that overcome historical patterns of segregation in disinvested neighborhoods while also increasing housing choices and access in higher resourced areas, and demonstrating the likelihood of redevelopment on nonvacant sites.

The County must continue timely and effective implementation of all programs including but not limited to the following:

- **Affirmatively Furthering Fair Housing (AFFH) – Place-based Strategies:** The County will be implementing place-based strategies for community revitalization and conservation through updating several specific plans targeted at areas of high segregation and poverty and Racially and Ethnically Concentrated Areas of Poverty (RECAPS). Place-based strategies in these communities will include but are not limited to economic development, infrastructure improvements, displacement and anti-gentrification strategies, and placemaking such as civic art and landscaping. As identified in the County's Assessment of Fair Housing, the need for improving these communities and providing equal access to opportunity is critical to overcoming patterns of segregation and inequities. These programs include Program 2 (Florence-Firestone Transit Orientated Specific Plan), Program 3 (Climate Action Plan), Program 7 (East San Gabriel Valley Area Plan), Program 8 (Area Metro Plan), Program 15 (Equity Audit of Land Use Zoning Code and

Infrastructure Plans), Program 18 (South Bay Area Plan), Program 19 (West San Gabriel Valley Plan), Program 20 (Westside Area Plan).

- *Facilitating Development on Nonvacant Sites*: Program 25 (Adaptive Reuse Ordinance) commits to adopting and marketing an adaptive reuse ordinance by June, 2025, to promote the conversion of underutilized buildings into permanent affordable housing.
- *Facilitating Affordable Development on Small Sites*: The element included parcels of less than 0.5 acres to accommodate a portion of their Regional Housing Needs Allocation (RHNA). Program 21 (Incentives for Lot Consolidation) will include adopting and marketing lot consolidation incentives to facilitate development.
- *Development on Publicly Owned Sites*: The element is accommodating 8,290 RHNA units on County-Owned Sites in incorporated jurisdictions. To facilitate development, Program 41 (Development of County-Owned Sites) commits developing sites per sovereign immunity, issuing requests for proposals, and site-specific outreach and incentives.
- *Accessory Dwelling Units (ADU)*: The County is counting 450 ADUs per year to accommodate the RHNA. Program 26 (Accessory Dwelling Unit Construction) commits to developing incentives to promote ADU construction including prototype plans and engagement and training materials for homeowners. This program also commits to targeting ADUs in high resourced areas. Should the County realize that ADU production rates are not at pace with current assumptions, the County will identify additional sites within six months.

The County must monitor and report on the results of this and other programs through the annual progress report, required pursuant to Government Code section 65400. Please be aware, Government Code section 65585, subdivision (i) grants HCD authority to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or housing element law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law.

In addition, the element includes Program 9 (Inclusionary Housing Feasibility and Implementation) and Program 17 (Adequate Sites for RHNA) identifying adequate sites to accommodate the shortfall of 20,750 units for lower-income, 9,019 for moderate, and 26,005 for above-moderate income households by committing to rezone at least 276 acres by November 2024. Among other things, the program commits to zoning with densities of 30-150 units per acre and permit owner-occupied and rental multifamily uses by right for developments in which 20 percent or more of the units are affordable to lower-income households.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), as the County failed to adopt a compliant housing element within 120 days of the statutory

deadline (October 15, 2021), Program 9 (Inclusionary Housing Feasibility and Implementation) and Program 17 (Adequate Sites for RHNA) must be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

HCD applauds the County for the comprehensive approach to AFFH including rezoning in neighborhoods that were previously inaccessible due to exclusionary zoning and community opposition. These efforts allow for increased access to higher resourced communities for lower-income households. Additionally, the County is committed to a holistic approach revitalizing disinvested communities through key infrastructure and community development improvements. HCD appreciates the County's commitments and leadership for advancing policies and programs that promote inclusive communities.

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

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

HCD appreciates the hard work and partnership the housing element team, notably Connie Chung, Assistant Administrator and Ting Fung, Supervising Regional Planner provided throughout the housing element review. HCD wishes the County success in implementing its housing element and looks forward to following its progress through the General Plan annual progress reports pursuant to Government Code section 65400. If HCD can provide assistance in implementing the housing element, please contact Sohab Mehmood, of our staff, at [sohab.mehmood@hcd.ca.gov](mailto:sohab.mehmood@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager