



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

October 18, 2016

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

**REGARDING THE REPORT ON THE BOARD MOTION REGARDING
AFFORDABLE HOUSING APPROVALS AND STREAMLINING OPPORTUNITIES
(JULY 5, 2016, ITEM 3) (ALL SUPERVISORIAL DISTRICTS)**

SUBJECT

On August 5, 2016, Department of Regional Planning (DRP) provided the Board of Supervisors (Board) with the Affordable Housing Approvals: Current Practices and Opportunities Report (Attachment 1), which identifies environmental review streamlining opportunities for affordable housing developments based on the California Environmental Quality Act (CEQA). Currently, the County unincorporated communities are not eligible for any of these streamlining options.

To make CEQA streamlining available in unincorporated urban areas, the report recommends that the Board adopt findings pursuant to Section 21071(b) (2) of the State CEQA Guidelines. Specifically, the Board action will allow developers to utilize statutory CEQA exemptions for qualified affordable housing projects that are modest in scale, consistent with the General Plan, and located outside of areas with environmental constraints. This will expedite the CEQA review process, potentially result in cost savings, and incentivize the development of affordable housing in the unincorporated areas. Upon Board approval of a resolution (Attachment 2), DRP will file the draft findings with the Governor's Office of Planning and Research (OPR) and return to the Board for final adoption after 30 days, during which OPR may submit comments regarding the draft findings.

In a concurrent effort, DRP will work in conjunction with the Chief Executive Office to continue to advocate for changes to CEQA that would further expand CEQA streamlining eligibility to additional unincorporated communities. Furthermore, DRP will continue to pursue opportunities to expedite the entitlement of affordable housing

developments, including coordination with other County departments that are part of the entitlement process.

IT IS RECOMMENDED THAT THE BOARD:

Approve the attached resolution, in which the Board finds that the Los Angeles County General Plan supports principles of compact development.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

On July 5, 2016, the Board instructed the Director Planning to report back in 30 days on existing practices employed by the County to expedite entitlement and environmental reviews for affordable housing developments and opportunities that may exist to further expedite these reviews.

Implementation of Strategic Plan Goals

This action supports the County's Strategic Plan, Goal 1, Operational Effectiveness/Fiscal Sustainability, and Goal 2, Community Support and Responsiveness, by providing the public with services that are delivered in a timely manner and respond to economic and social challenges.

FISCAL IMPACT/FINANCING

None.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

On October 6, 2015, the Board adopted the Los Angeles County General Plan, which provides the policy framework for how and where the unincorporated Los Angeles County will grow through the year 2035.

The attached resolution affirms that the General Plan supports principles of compact development as required in CEQA for unincorporated urban areas to be eligible for streamlining.

ENVIRONMENTAL DOCUMENTATION

Approval of this resolution will not have an effect on the environment and therefore, this action is exempt from CEQA, pursuant to Section 15378 (b) (4) of the CEQA Guidelines.

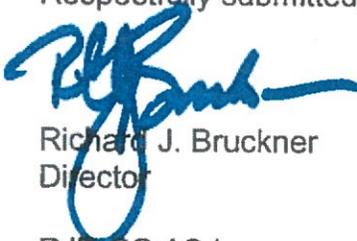
The Honorable Board of Supervisors
October 18, 2016
Page 3

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The Board's approval of the resolution furthers DRP's ability to expedite affordable housing entitlement approvals.

Should you have any questions regarding the resolution, please contact Connie Chung at cchung@planning.lacounty.gov or (213) 974-6417.

Respectfully submitted,



Richard J. Bruckner
Director

RJB:CC:AS:lm

Attachments (2)

- c: Executive Office, Board of Supervisors
- County Counsel
- Beaches and Harbors
- Chief Executive Office
- Community Development Commission
- Fire Department
- Parks and Recreation
- Public Health
- Public Works



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

August 3, 2016

TO: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Richard J. Bruckner
Director

REPORT ON BOARD MOTION REGARDING AFFORDABLE HOUSING (AGENDA ITEM NO. 3, JULY 5, 2016)

On July 5, 2016, the Board of Supervisors (Board) instructed the Director of the Department of Regional Planning (DRP) to report back in 30 days on existing practices employed by the County to expedite entitlement and environmental reviews for affordable housing developments and opportunities that may exist to further expedite these reviews. The following report details DRP's current affordable housing project entitlement process, existing efforts to streamline the process, and opportunities to further expedite reviews. It also identifies environmental review streamlining opportunities for affordable housing developments based on the California Environmental Quality Act (CEQA).

As an immediate next step, DRP and County Counsel will prepare the necessary findings pursuant to the recently adopted County General Plan and coordinate with the Governor's Office of Planning and Research (OPR) to expand the applicability of CEQA streamlining provisions and exemptions for affordable housing, housing near transit, and infill development to the unincorporated areas.

Part I: Practices to Expedite Affordable Housing

Currently, DRP employs the following practices to expedite project review and entitlement for affordable housing developments:

- Expedited case intake appointments.
- Pre-submittal one stop counseling for the applicant to receive project-specific guidance early in the process. This counseling may involve DRP staff only or staff from other reviewing departments (e.g., Department of Public Works (DPW), Fire Department (Fire), Department of Public Health (DPH), the Community Development Commission (CDC)).

- Coordination with reviewing departments to provide comments and recommended conditions on an expedited basis.
- Meetings with the applicant throughout the process to identify and resolve issues.
- A processing timeline to ensure timely project completion. To the extent possible, project review, report preparation, and public hearings are expedited to meet funding deadlines.
- For discretionary approvals, a recommendation to applicants to conduct public outreach with established community groups early on in the process.

Additional Opportunities

DRP has identified the following next steps, which can enhance current practices to expedite affordable housing:

- Assignment of a staff position in the Current Planning Division of DRP that is dedicated to affordable housing project entitlements. This position would be responsible for consultations, project review, and providing comments and recommended conditions to applicants. The staff member in this position also help track legislative changes and coordinate with staff in the Advance Planning Division of DRP on the implementation of affordable housing incentive programs and other efforts.
- Integration of EPIC-LA across all reviewing departments of affordable housing developments (DPW, DPH, Fire, DPH, and CDC). For example, DPW intends to implement EPIC-LA e-review in early 2017.

Part II: Environmental Review of Affordable Housing Developments – Opportunities for California Environmental Quality Act Streamlining and Exemptions

There are existing provisions in CEQA to promote streamlining and exemptions for affordable housing, housing near transit, and infill housing. CEQA Statutes for Infill Projects Streamlining (State Public Resources Code Section 21094.5) and the affordable housing exemption (State Public Resources Code Sections 21159.23 through 21159.24) provide streamlining and exemptions for residential and non-residential projects to support and incentivize certain types of development. Typically, CEQA streamlining and exemptions apply to affordable housing, development near transit stations, and infill development. However, the applicability of these provisions is limited for county unincorporated areas. With the following recommended actions, there is an opportunity for the County to expand the applicability of these exemptions to the unincorporated areas.

Current Opportunities

To qualify for streamlining and exemptions, CEQA states that projects within the unincorporated areas must be located within an "urban area" or "urbanized area." An "urban area" or "urbanized area" must meet the following criteria:

- The population of the unincorporated area and the surrounding cities equals at least 100,000; and
- The population density of the unincorporated area at least equals the population density of the surrounding cities.

Furthermore, CEQA states that counties must issue a finding that the general plan and other related policies promote compact development and affordable housing. Specifically, the legislative body must take the following actions as stated in Section 21071(b) (2) of the CEQA Guidelines:

(A) [Issue] a finding that the general plan, zoning ordinance, and related policies and programs applicable to the unincorporated area are consistent with principles that encourage compact development in a manner that does both of the following:

(i) Promotes efficient transportation systems, economic growth, affordable housing, energy efficiency, and an appropriate balance of jobs and housing.

(ii) Protects the environment, open space, and agricultural areas.

(B) [Submit] a draft finding to the Office of Planning and Research at least 30 days prior to issuing a final finding, and [allow] the office 30 days to submit comments on the draft findings to the board of supervisors.

As shown in Attachment A, there are 23 unincorporated areas that meet the criteria for "urban area" or "urbanized area." These unincorporated areas are also listed in Attachment B.

Given that the County General Plan, which was adopted by the Board on October 6, 2015, is consistent with the compact growth principles described above, DRP and County Counsel will prepare the necessary findings and coordinate with the OPR to expand the applicability of these streamlining provisions and exemptions to these 23 unincorporated areas.

Additional Opportunities

In conjunction to the findings, DRP, County Counsel, and the Chief Executive Office will continue to advocate for legislative changes in CEQA to further expand the applicability of streamlining provisions and exemptions for affordable housing, development near transit stations, and infill development in the unincorporated areas. This is important, given that Los Angeles County has the third largest population density in the State.

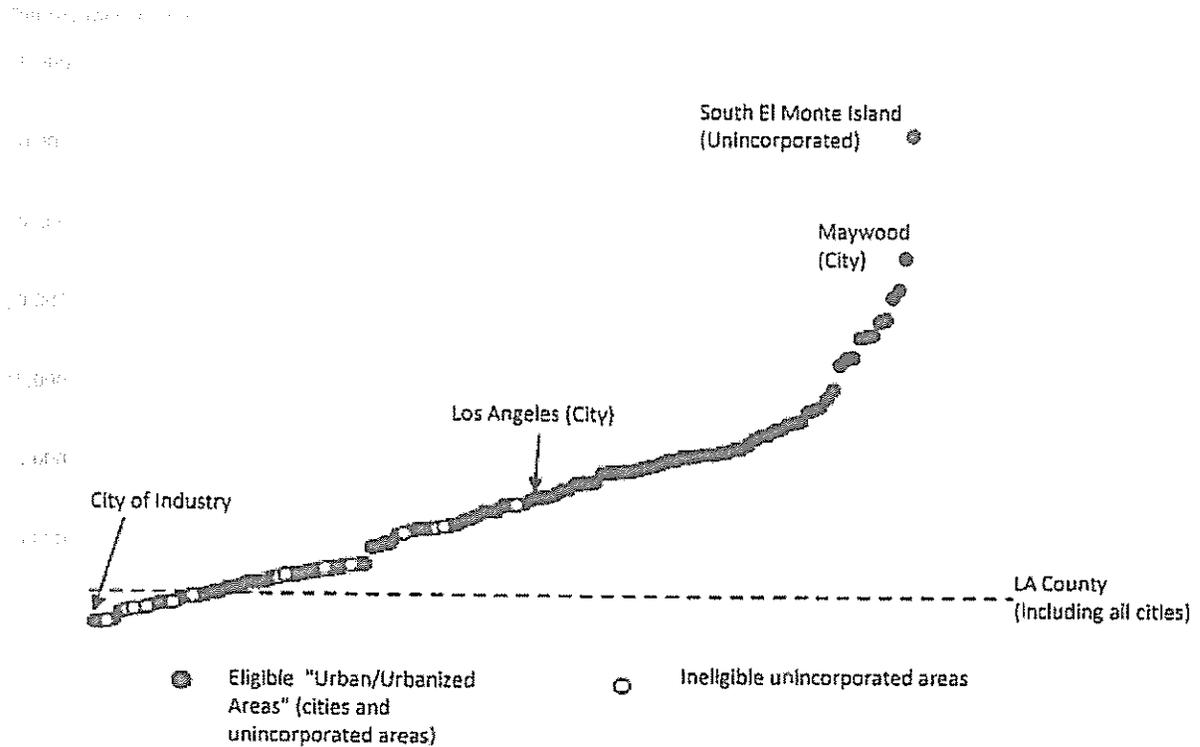
CEQA's definitions of "urban areas" and "urbanized areas" are inadequate because they exclude unincorporated areas that are as dense as eligible incorporated cities. Attachments C and D identify unincorporated areas that are not eligible for CEQA streamlining or exemptions because they are less dense than the average density of the surrounding incorporated cities. However, these unincorporated areas are located adjacent to or in close proximity to cities and with comparable or greater population densities than eligible cities.

Population Density Comparison by Geographic Area

Geographic Area	Population (2010 Census)	Population Density (Persons per square mile)
California	37,253,956	239
Los Angeles County (including all cities)	9,818,605	2,420
Los Angeles County Unincorporated Areas	1,031,885	392
Los Angeles County Urban Unincorporated Areas	798,410	7,190

Source: DRP GIS Section

Population Densities for Eligible and Ineligible Areas for Select California Environmental Quality Act Streamlining and Exemptions in Los Angeles County



Source: DRP GIS Section

In addition to changes to CEQA, at the Board's request, DRP is pursuing other opportunities for affordable housing creation and preservation. As part of the County's Homeless Initiative, and under the Equitable Development Work Program associated with the General Plan, DRP will assess strategies such as value capture, inclusionary zoning, a linkage fee, community land trust and other shared equity models.

Each Supervisor
August 3, 2016
Page 6

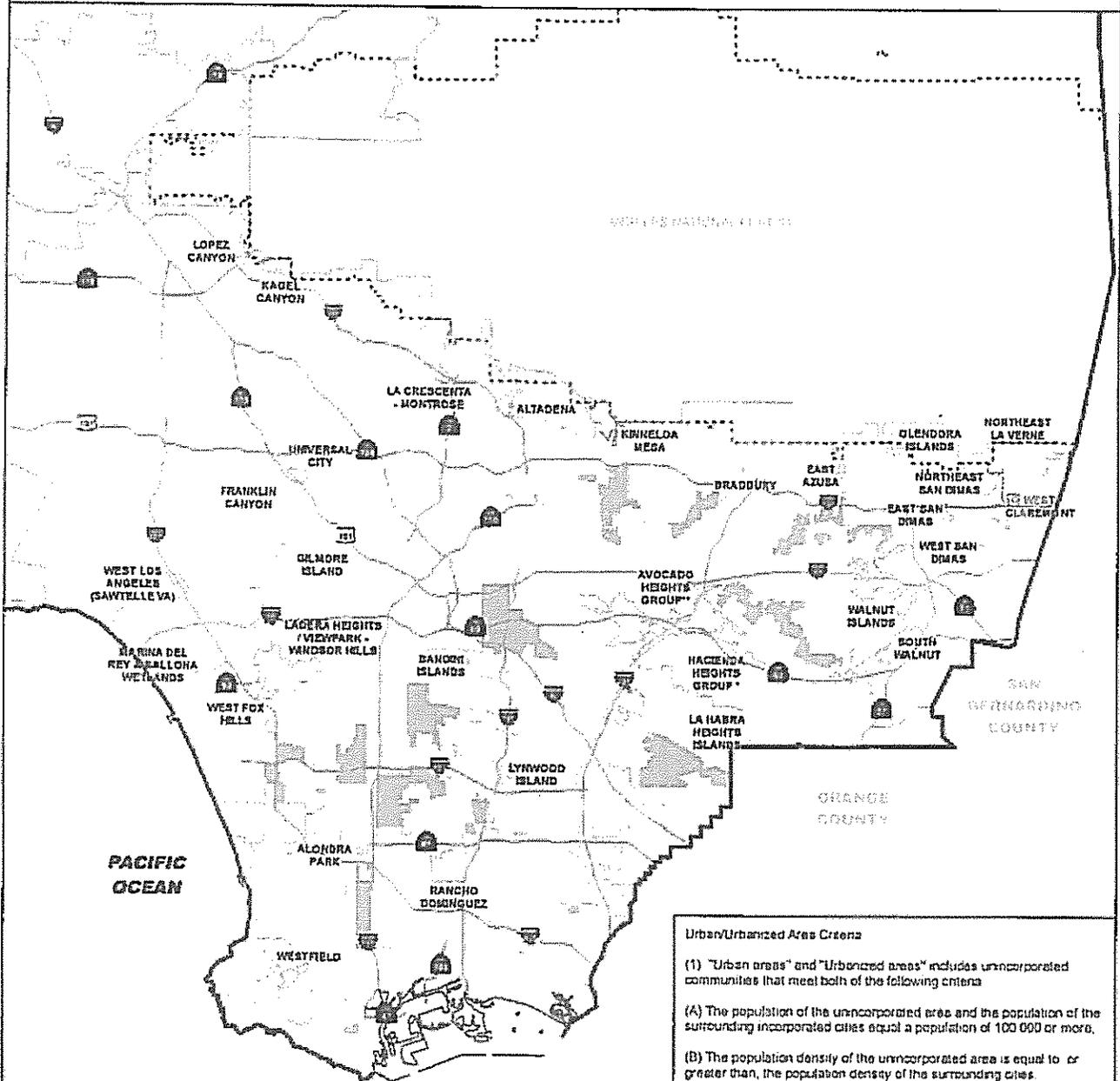
For questions related to Part I of this report, please contact Maria Masis in the Zoning Permits East Section at mmasis@planning.lacounty.gov and (213) 974-6435. For questions related to Part II of this report, please contact Connie Chung in the General Plan Development and Housing Section at cchung@planning.lacounty.gov and (213) 974-6417.

RJB:MM:CC:ems

- Attachment A: Map of Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Areas Definition
- Attachment B: Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Areas Definition
- Attachment C: Map of Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County
- Attachment D: Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County

c: Executive Office, Board of Supervisors
County Counsel
Chief Executive Office
Community Development Commission
Fire
Public Health
Public Works

Attachment A: Map of Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Areas Definition



Urban/Urbanized Area Criteria

(1) "Urban areas" and "Urbanized areas" includes unincorporated communities that meet both of the following criteria

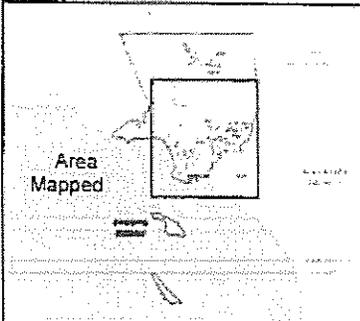
(A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.

(B) The population density of the unincorporated area is equal to or greater than, the population density of the surrounding cities.

NOTE

* Population, acreage and density for the contiguous area made up of West Whittier-Los Nietos, North Whittier, Hacienda Heights, Rowland Heights & South Diamond Bar was combined with an adjacent Orange County unincorporated area.

** Population, acreage and density for the contiguous area is made up of Avocado Heights, Whittier Narrows & South San Gabriel.



Eligible Urban/Urbanized Area
 Ineligible Urban/Urbanized Area
 Incorporated City



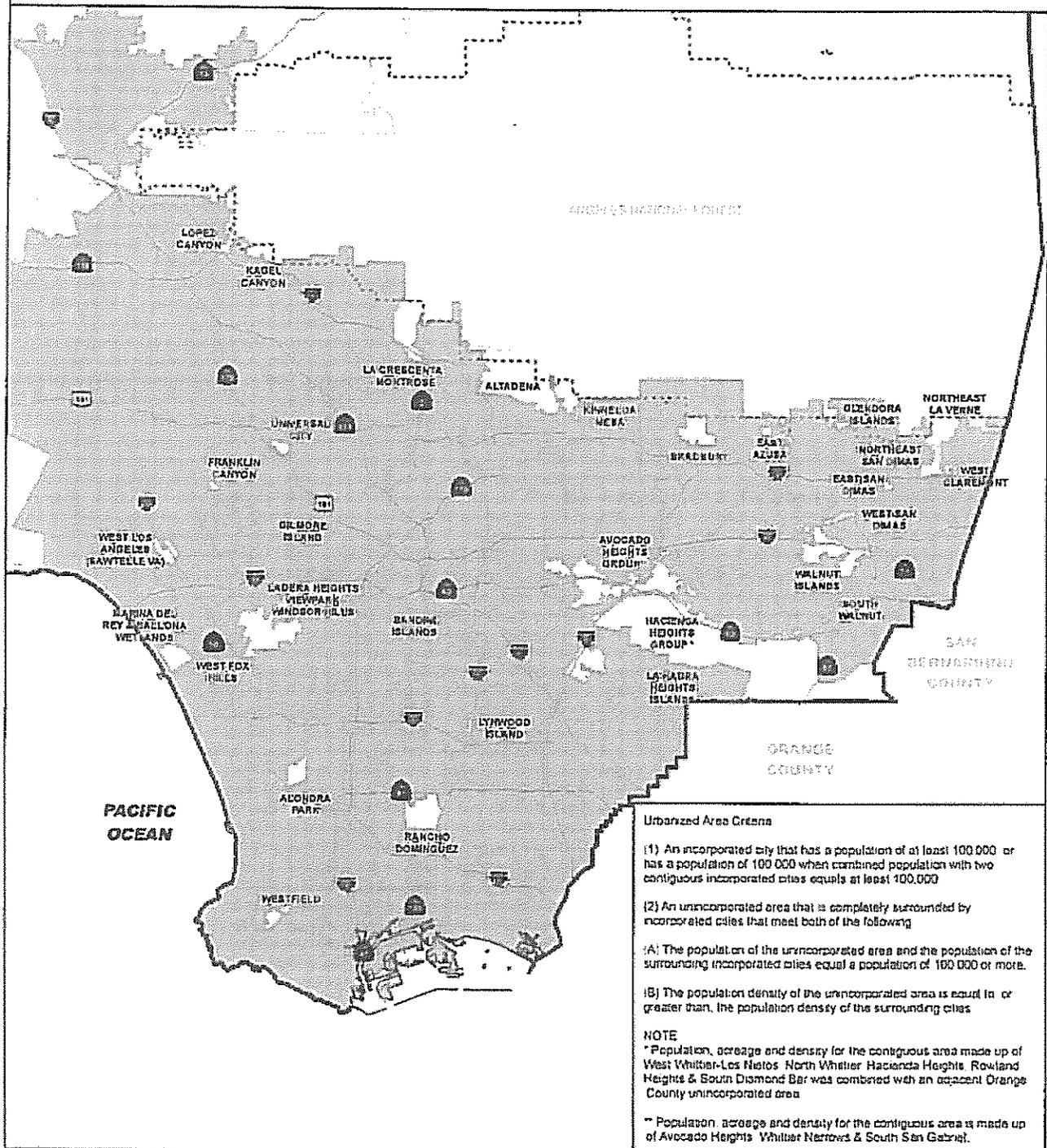
Attachment B: Eligible Unincorporated Areas Meeting CEQA Urban/Urbanized Area Definition

Community Name	Density (per square mile)	Population*
SOUTH EL MONTE ISLAND	30,989	138
HAWTHORNE ISLAND	21,361	2,488
LENNOX	20,828	22,792
EAST RANCHO DOMINGUEZ	18,415	15,135
FLORENCE - FIRESTONE, WALNUT PARK	18,334	79,353
EAST LOS ANGELES	16,977	126,492
WEST PUENTE VALLEY	12,911	24,105
W ATHENS - WESTMONT	12,745	40,582
SOUTH SAN JOSE HILLS, VALINDA	12,315	43,373
COVINA ISLANDS	11,958	15,482
CERRITOS ISLANDS	10,941	661
EAST IRWINDALE	10,814	15,922
NORTH POMONA	10,605	544
SOUTH WHITTIER - SUNSHINE ACRES	10,393	66,913
DEL AIRE	9,861	10,001
LA RAMBLA	9,730	2,034
CHARTER OAK	9,655	9,670
SOUTH MONROVIA ISLANDS	9,637	16,259
LONG BEACH ISLAND	9,592	1,410
WEST CARSON	8,520	21,700
EAST PASADENA - EAST SAN GABRIEL	8,204	28,829
SAN PASQUAL	8,001	2,041
W RANCHO DOMINGUEZ - VICTORIA, WILLOWBROOK	7,989	45,206

Source: DRP GIS Section

*Note: Per CEQA Statute 21094.5.(e).(5).A and 21071(b)(1)(A)(i), these communities meet the minimum population requirement because the population of the unincorporated area and the surrounding incorporated cities equal not less than 100,000 persons.

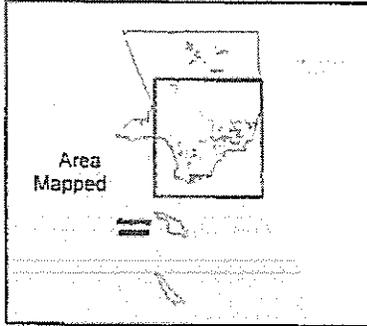
Attachment C: Map of Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County



Urbanized Area Criteria

- (1) An incorporated city that has a population of at least 100,000 or has a population of 100,000 when combined population with two contiguous incorporated cities equals at least 100,000
- (2) An unincorporated area that is completely surrounded by incorporated cities that meet both of the following:
 - (A) The population of the unincorporated area and the population of the surrounding incorporated cities equal a population of 100,000 or more.
 - (B) The population density of the unincorporated area is equal to or greater than the population density of the surrounding cities

NOTE
 * Population, acreage and density for the contiguous area made up of West Whittier-Los Nietos, North Whittier, Hacienda Heights, Rowland Heights & South Diamond Bar was combined with an adjacent Orange County unincorporated area.
 ** Population, acreage and density for the contiguous area is made up of Avocado Heights, Whittier Narrows & South San Gabriel.



Eligible Urban/Urbanized Area
 Ineligible Urban/Urbanized Area



Attachment D: Ineligible Unincorporated Areas with Population Densities Comparable to Cities in Los Angeles County

Unincorporated Area	Density (per square mile)	Population*
ALONDRA PARK	7,518	8,592
MARINA DEL REY	6,094	8,866
WEST FOX HILLS	5,670	255
LADERA HEIGHTS / VIEWPARK - WINDSOR HILLS	3,660	17,573
AVOCADO HEIGHTS, SOUTH SAN GABRIEL, WHITTIER NARROWS	3,425	25,697
HACIENDA HEIGHTS, NORTH WHITTIER, ROWLAND HEIGHTS, SOUTH DIAMOND BAR, WEST WHITTIER-LOS NIETOS	3,040	133,839
WESTFIELD	2,902	2,005
WALNUT ISLANDS	1,285	4,841
RANCHO DOMINGUEZ	966	2,597
WEST LOS ANGELES (SAWTELLE VA)	770	702

Source: DRP GIS Section

*Note: Per CEQA Statute 21094.5.(e).(5). and 21071(b).(1).(A), these communities meet the minimum population requirement because the population of the unincorporated area and the surrounding incorporated cities equal not less than 100,000 persons. However, they do not meet the minimum density requirement because the density of the unincorporated area is less than that of the surrounding incorporated cities.

Attachment C: Findings
CEQA Exemption 21071(b)(2)

**A RESOLUTION OF THE BOARD OF SUPERVISORS
OF THE COUNTY OF LOS ANGELES
FINDING THE LOS ANGELES COUNTY GENERAL PLAN CONSISTENT
WITH COMPACT DEVELOPMENT PRINCIPLES AS DEFINED BY THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

WHEREAS, the County of Los Angeles (County) is authorized to prepare a general plan, pursuant to the State Law (commencing with §65300 of the California Government Code);

WHEREAS, the California Government Code requires that each city and county adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning";

WHEREAS, the County is authorized to adopt amendments to the County Zoning Ordinance, pursuant to the State Law (commencing with §65800 of the California Government Code);

WHEREAS, the Board of Supervisors (Board) conducted a duly noticed public hearing on the matter of the update to the Los Angeles County General Plan on March 24, 2015, and indicated its intent to approve the General Plan and certify its Final Environmental Impact Report;

WHEREAS, the Board conducted a public hearing on the matter of the update to the Los Angeles County General Plan on October 6, 2015, and adopted Project No. 02-305-(1-5), which included the following:

1. General Plan. Provides guiding principles and establishes the framework for existing and future planning efforts for the unincorporated areas of Los Angeles County, and includes goals, policies, implementation programs, figures, and maps. The Zoning Code (Title 22) of the Los Angeles County Code is an implementation tool of the General Plan.

The General Plan is based on the following guiding principles:

- Employ Smart Growth: Shape new communities to align housing with jobs and services; and protect and conserve the County's natural and cultural resources, including the character of rural communities.
- Ensure community services and infrastructure are sufficient to accommodate growth: Coordinate an equitable sharing of public and private costs associated with providing appropriate community services and infrastructure to meet growth needs.
- Provide the foundation for a strong and diverse economy: Protect areas that generate employment and promote programs that support a stable and well

educated workforce. This will provide a foundation for a jobs-housing balance and a vital and competitive economy in the unincorporated areas.

- Promote excellence in environmental resource management: Carefully manage the County's natural resources, such as air, water, wildlife habitats, mineral resources, agricultural land, forests, and open space in an integrated way that is both feasible and sustainable.
- Provide healthy, livable and equitable communities: Design communities that incorporate their cultural and historic surroundings, are not overburdened by nuisance and negative environmental factors, and provide reasonable access to food systems.

General Plan policies and programs that promote sustainable development include the following:

Transit Oriented Districts (TOD)

TODs are areas within one-half mile of a transit station that promote transit-oriented development, or pedestrian-friendly and community-serving uses that encourage walking, bicycling, and transit use. The TOD Program is designed to work in conjunction with regional and statewide efforts to incentivize transit-oriented development, and create infill development opportunities in many unincorporated communities.

Complete Streets and Active Transportation

The General Plan includes policies to ensure that the County plans for the routine accommodation of all users including pedestrians, bicyclists, users of public transit, motorists, children, seniors and people with disabilities in compliance with the Complete Streets Act of 2007.

Employment Protection Districts (EPD)

EPDs are economically-viable industrial and employment-rich lands recommended for protection from conversion to non-industrial uses.

Conservation and Natural Resources Element

The Conservation and Natural Resources Element addresses dedicated open space; woodlands, coastal areas, forests, wetlands, and the Significant Ecological Areas (SEA) Program; water quality and watershed management; Agricultural Resource Areas (ARAs) and sustainable agriculture; and other natural and historical resources.

Significant Ecological Areas

An SEA designation is given to land that contains significant biological resources. Individual SEAs include undisturbed or lightly disturbed habitats that support valuable and threatened species, linkages and corridors to promote species movement, and are sized to support sustainable populations of its component species.

Agricultural Resource Areas

ARAs promote the preservation of agricultural land. ARAs consist of farmland identified by the California Department of Conservation and the Los Angeles County Agricultural Commissioner/Weights and Measures. The ARAs are designed to encourage agricultural uses and ensure compatibility between agricultural and non-agricultural land uses through buffering, development standards, and design requirements.

Community Climate Action Plan (CCAP)

The CCAP is a sub-component of the Air Quality Element. The CCAP, in conjunction with other concurrent climate change and sustainability initiatives, represents the County's commitment to the Global Warming Solutions Act (AB 32), which was passed by the California legislature in 2006.

The CCAP identifies greenhouse gas (GHG) emissions related to community activities in the unincorporated areas; establishes a reduction target consistent with AB 32; and provides a roadmap for successfully implementing actions selected by the County to reduce GHG emissions. The County conducted an analysis to identify a reduction of 11% below 2010 levels is needed to achieve consistency with the State's AB 32 goals and the California Air Resource Board Scoping Plan.

The majority of emission reductions are gained from state building energy efficiency standards and mandates for renewable energy generation.

2. Programmatic Environmental Impact Report (EIR) for the General Plan in compliance with CEQA. The Final EIR contains a summary of the potential environmental effects of the General Plan, the recommended mitigation measures that would reduce or avoid those effects, and the level of significance after mitigation. The Board determined that where significant adverse environmental effects of the Project, as described in the Final EIR, have not been reduced to a level of less than significant, the Project benefits, such as, specific social, economic, legal, technological or other considerations outweigh the environmental effects of the project as stated in the CEQA Findings and Statement of Overriding Considerations for the project.

WHEREAS, the Housing Element in the General Plan was adopted by the Board in February 2014 pursuant to Government Code Section 65588, and is included by reference as part of the General Plan;

WHEREAS, as required by State law, the State Department of Housing and Community Development certified the Housing Element in April 2014;

WHEREAS, the primary focus of the Housing Element is to ensure decent, safe, sanitary, and affordable housing for current and future residents of the unincorporated areas, including those with special needs;

NOW, THEREFORE BE IT RESOLVED, that the Board of Supervisors of the County of Los Angeles, per Section 21071(b)(2) of the state CEQA Guidelines:

1. Finds that the General Plan, zoning ordinance, and related policies and programs are consistent with principles that encourage compact development in a manner that promotes efficient transportation systems, economic growth, affordable housing, energy efficiency, and an appropriate balance of jobs and housing; and
2. Finds that the General Plan protects the environment, open space, and agricultural areas.
3. Directs the Department of Regional Planning to file these findings in draft form with the Governor's Office of Planning and Research.

The foregoing resolution was on the ____ day of ____, 2016, adopted by the Board of Supervisors of the County of Los Angeles.

By _____

APPROVED AS TO FORM:
OFFICE OF THE COUNTY COUNSEL

By _____