

REVISED COUNTY OF LOS ANGELES HOUSING ELEMENT (2021-2029) APPENDICES

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APPENDIX A: EXISTING CAPACITY (SITES INVENTORY, SELECT ENTITLED PROJECTS, SPECIFIC PLANS, AND COUNTY-OWNED SITES IN CITIES)

REFER TO HCD TABLES A AND C

APPENDIX B: SITES FOR REZONING

REFER TO HCD TABLE B

APPENDIX C: REVIEW OF PAST ACCOMPLISHMENTS

PROGRESS TOWARD MEETING THE REGIONAL HOUSING NEEDS ALLOCATION (RHNA)

The County's RHNA was reduced from 30,145 to 27,440, due to RHNA transfers for annexations. As of December 31, 2020, 7,116 units were constructed, representing about 26% of the County's RHNA for the planning period (**Table C-1**). The County achieved about 10% of the very low and low income RHNA, and less than 1% of the moderate income RHNA.

Table C-1: Progress Toward RHNA

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	7,404	4,281	4,930	10,825	27,440
Units Constructed	734	457	19	5,906	7,116
Remaining	6,670	3,824	4,911	4,919	20,324
% Completed	10%	11%	<1%	55%	26%

Source: 2020 Housing Element Annual Progress Report.

PROGRESS TOWARD IMPLEMENTING PROGRAMS AND OBJECTIVES

When updating the Housing Element, state law requires that the local jurisdiction review its previous Housing Element in order to evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal.
- The effectiveness of the Housing Element in the attainment of the community's housing goals and objectives.
- The progress in implementing the Housing Element.

A program-by-program review of the County's accomplishments under the previous Housing Element is presented in **Table C-2**. Based on current state law, housing programs must contain measurable goals, specific timelines, and active participation of the County.

EFFECTIVENESS IN ADDRESSING SPECIAL NEEDS

The County adopted the Interim and Supportive Housing Ordinance in 2021, which addresses the provision of different types of special needs housing. Most of these special needs housing types are permitted by right in residential and most mixed-use zones. The adoption of the Interim and Supportive Housing Ordinance substantially expanded the opportunities for special needs housing and streamlined the approval process.

Regarding the construction of housing for persons with special needs, through the First 5 LA Notice of Funding Availability (NOFA) process, the Los Angeles County Development Authority (LACDA) funded five projects that incorporate supportive services: Beverly Hills Terrace, Cedar Ridge Apartments, Marv's Place Apartments, Vermont Manzanita, and Whittier Place. LACDA's NOFA process also provided incentives for universal design features to promote accessibility, and required projects to include federal Low Income Housing Tax Credit financing.

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
Housing Availability		
1. Adequate Sites for Regional Housing Needs	<ul style="list-style-type: none"> Facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate 30,145 units (ongoing). Maintain an inventory of sites and make it available to interested developers (ongoing). 	<p>The County has made a Potential Housing Sites application open to the public.¹ The application includes the adequate sites inventory from the 2014-2021 Housing Element.</p> <p>The following community-based plans are currently being updated and/or created:</p> <ul style="list-style-type: none"> East San Gabriel Valley Area Plan Metro Area Plan Santa Monica Mountains North Area Plan <p>Department of Regional Planning (DRP) has been working with the County CEO to coordinate the transfer of RHNA in annexations. During the planning period, the County transferred a total of 2,705 units as follows: 2,659 units to the City of Santa Clarita, 40 units to the City of Glendora, and 6 units to the City of Palmdale.</p> <p>Continued Appropriateness</p> <p>The 2021-2029 Housing Element includes an updated program to reflect the 6th cycle RHNA and the County's strategy for meeting the RHNA of 90,052 units. The updated Housing Element includes programs to monitor for no net loss (SB 166) and ADU trends.</p>
2. General Plan Update	<ul style="list-style-type: none"> Maintain an inventory of sites and make it available to interested developers (by 2014). 	<p>The Los Angeles County Board of Supervisors (Board) adopted the updated General Plan on October 6, 2015. The Adequate Sites Inventory is available to the public on the County's Potential Housing Sites application.¹</p>

¹ The County's Potential Housing Sites application is available at: <http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=75fba821076b4df48f0e00fe701b6841>. Accessed July 2020.

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
		<p>Continued Appropriateness</p> <p>The comprehensive update of the General Plan was completed in 2015. No comprehensive update of the General Plan is anticipated during 2021-2029 Housing Element planning period.</p>
3. Zoning Ordinance Update Program	<ul style="list-style-type: none"> Mitigate possible constraints on low- to moderate -income and special needs housing development caused by County rules and regulations. Amend the Zoning Ordinance through the Technical Update (by 2015). Amend the Zoning Ordinance through the Zoning Ordinance Update Program (ZOUP) and other programs (by 2016). 	<p>The Zoning Ordinance Update Program, now the Technical Update to Title 22, was adopted January 2019. The ordinance amended Title 22 to reorganize, clarify and simplify code language, consolidate identical or similar standards or procedures, delete obsolete or redundant code provisions, and streamline administrative and case processing procedures.</p> <p>In 2019, the Board adopted the Density Bonus Ordinance Update (see Program 4, Density Bonus Ordinance).</p> <p>Continued Appropriateness</p> <p>DRP is committed to updating the Zoning Code annually through "Tune-Ups" to incorporate new state laws and for cleanup purposes.</p>
4. Density Bonus Ordinance	<ul style="list-style-type: none"> Continue to promote the County Density Bonus Program to developers through the dissemination of brochures, presentations, and web postings on the DRP website and by offering technical assistance to the public (ongoing). 	<p>On October 15, 2019, the Board adopted the Density Bonus Ordinance Update, which implements the State Density Bonus Law. The ordinance promotes affordable and senior housing and restructures related provisions for ease of use. The County developed materials to coordinate the implementation of density bonuses with overlapping policies such as SB 35, AB 2162, and AB 2222.</p> <p>Staff continues to promote the Density Bonus Ordinance through a webpage, bilingual fact sheets and flow charts, and offers technical assistance and consultation to the public.</p> <p>Continued Appropriateness</p> <p>This program has been completed. The County's Density Bonus Ordinance will be updated as needed to reflect updates to the State Density Bonus Law. A new program - Housing for Deeply Low Income Households - may require future updates to the Density Bonus Ordinance.</p>
5. Infill Sites Utilization Program	<ul style="list-style-type: none"> Promote the County Infill Sites Utilization Program and offer technical assistance to the public, as funds become available, in conjunction with the Density Bonus Ordinance (by 2014, ongoing). 	<p>The Infill Sites Utilization Program was amended in early 2009 to incorporate the use of Federal Neighborhood Stabilization (NSP) Funds for the acquisition and rehabilitation of foreclosed one to four unit properties. As of 2019, the program provided for the acquisition and rehabilitation of 19 homes reserved as affordable rentals for households earning less than 50% of the Area Median Income (AMI).</p> <p>Continued Appropriateness</p> <p>This program has concluded and is not included in the 2021-2029 Housing Element.</p>

Table C-2: Review of 2014 Housing Element Programs

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6. Transit-Oriented Districts Program	<ul style="list-style-type: none"> • Complete Willowbrook Transit Oriented District (TOD) Specific Plan (by 2016). • Establish all TOD Specific Plans (by 2021). <ul style="list-style-type: none"> ○ Eleven TODs will be located along the Metro Blue Line, Green Line, Gold Line, Gold Line Extension, and near the Metro Silver Line. 	<p><u>East LA 3rd Street Specific Plan</u></p> <p>The East LA 3rd Street Specific Plan was adopted on November 12, 2014. The Specific Plan guides development surrounding the Metro Gold Line Stations and improves adjacent neighborhoods. This Specific Plan was amended in February 2020. The amendment provided minor technical changes to promote ease of use.</p> <p><u>Willowbrook TOD Specific Plan</u></p> <p>The Willowbrook TOD Specific Plan was adopted by the Board on September 18, 2018. The Willowbrook TOD Specific Plan aims to facilitate residential and employment-generating development in the Rosa Parks/Imperial Metro Station area. The Specific Plan includes the recommendations of the Martin Luther King, Jr. Medical Campus Master Plan and other planning efforts in Willowbrook.</p> <p><u>West Carson TOD Specific Plan</u></p> <p>The West Carson TOD Specific Plan was adopted by the Board on October 1, 2019. The West Carson TOD Specific Plan aims to facilitate residential and employment-generating development in the Carson Metro Bus Station area. This Specific Plan is facilitated in conjunction with the Harbor-UCLA Hospital Master Plan.</p> <p><u>Connect Southwest LA: A TOD Specific Plan for West Athens-Westmont</u></p> <p>This Connect Southwest LA TOD Specific Plan was adopted on May 12, 2020. Connect Southwest LA guides development in the area between the Metro Green Line Vermont/Athens Station and Los Angeles Southwest College.</p> <p><u>Florence-Firestone TOD Specific Plan</u></p> <p>The Florence-Firestone TOD Specific Plan guides future land use development and transportation access for the disadvantaged community in Florence-Firestone. The strategies and goals will be consistent with the County's General Plan, the Florence-Firestone Community Plan, Metro West Santa Ana Branch TOD Strategic Implementation Plan, the SCAG RTP/SCS, and California Transportation Plan 2040.</p> <p>Continued Appropriateness</p> <p>The County will continue to use the TOD as a tool to facilitate housing development. These TOD Specific Plans will be updated as part of the Metro Area Plan, which is included as an implementation program in the 2021-2029 Housing Element.</p>
7. Second Unit Ordinance	Promote the Second Unit Ordinance through the Department of Regional Planning website and brochures at public counters to increase affordable rental options in the County (by 2014).	The Accessory Dwelling Unit Ordinance, adopted in 2019, was updated to be consistent with State laws enacted in January 2020. The ordinance update was adopted in October 2020. The County continues to implement the State law and promote

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
		ADUs through a number of initiatives, such as the Homeless Initiative ADU Pilot Program. Continued Appropriateness As required by State law (AB 671), the 2021-2029 Housing Element includes a program to incentivize ADUs.
8. Small Lot Subdivisions Ordinance	Establish a Small Lot Subdivisions Ordinance to promote affordable homeownership through the allowance of smaller, fee-simple lots in areas zoned for two-family and multi-family housing where infill development is encouraged (by 2016).	On June 9, 2020, the Board adopted the Compact Lot Subdivision Ordinance. The Compact Lot Subdivision Ordinance establishes provisions for fee-simple, single-family residential lots that are less than 5,000 square feet in the multi-family residential zones. Continued Appropriateness The County will continue to implement the Compact Lot Subdivision Ordinance. However routine implementation of this ordinance is not included in the 2021-2029 Housing Element as a specific housing program.
9. Air Quality and Housing	Improve health conditions to the greatest extent while providing an adequate housing supply. The following measures will be implemented during the planning period: <ul style="list-style-type: none"> Collaborate with appropriate private and public agencies to address air quality and housing development issues (ongoing), Consider the effectiveness of approaches, such as mitigation and design, and other alternatives to policies to prohibit or not fund housing within 500 feet of a freeway (by 2016), Revise County policies to reflect identified best practices (ongoing). 	The Los Angeles County Development Authority (LACDA) does not fund residential development, including housing, play areas, community rooms, and community gardens, within 500 feet of a freeway. All projects that receive funding through LACDA's annual notice of funding are required to comply with these provisions. Continued Appropriateness The Our County Sustainability Plan, adopted by the Board of Supervisors in 2019, includes Action 1 with DRP as the lead agency: Limit siting of new sensitive uses, such as playgrounds, daycare centers, schools, residences, or medical facilities, at least 500 feet from freeways. The 2021-2029 Housing Element is consistent with the Our County Sustainability Plan with Policy 11.1.
Housing Affordability		
10. First 5 LA Supportive Housing for Homeless Families Fund	<ul style="list-style-type: none"> Provide services to families with young children who are homeless or at risk of homelessness. Serve 60 children with new housing development. Serve 400-500 children over a two-year period through rental assistance (ongoing). 	In 2012, LACDA awarded five projects through the First 5 LA Notice of Funding Availability (NOFA). NOFA funded projects are: Beverly Hills Terrace, Cedar Ridge Apartments, Marv's Place Apartments, Vermont Manzanita, and Whittier Place. Beverly Hills Terrace, the final project in the First 5 LA Project, was completed in January 2018. Supportive services continue to be provided for the First 5 LA Project households. Continued Appropriateness This program no longer exists as a funding source. Services are still provided at all projects that resulted from this funding source. This program is not included in the 2021-2029 Housing Element.
11. Countywide Affordable	Assist in the development of 350 extremely low and very low income rental housing units in the unincorporated areas through gap	LACDA has provided funding for a total of 1,143 units through the NOFA Round 25A. In 2019, No Place Like Home was issued and funded 58 housing developments and 4,251 units.

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Rental Housing Development	financing, a revolving loan fund, and technical assistance during the planning period (ongoing).	<p>As of 2019, LACDA received NOFA applications for a total of 2,722 units. Additionally, LACDA received a total of 55 applications through NOFA 26A, issued in 2020, for a total of 4,100 units; awards are anticipated to be given to a portion of the NOFA 26A applicants in 2021.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
12. Priority of Water and Sewer for Affordable Housing	Upon adoption and certification, provide copies of the Housing Element, including information on sites used to meet the RHNA, to all water and sewer districts that may be required to provide service to developments within the unincorporated areas (by 2014).	<p>DRP distributed copies of the Housing Element to all water and sewer districts that provide services to the unincorporated areas in 2014.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
13. Homebuyer Assistance	<p>Assist 1,050 low- and moderate-income first-time homebuyers in the unincorporated area and 43 affordable units through AHOP during the planning period (ongoing).</p> <ul style="list-style-type: none"> • Home Ownership Program (HOP) – 200 households • Mortgage Credit Certificate Program (MCC) – 250 households • Southern California Home Financing Authority (SCHFA) – 600 households • Affordable Homeownership Opportunities Program (AHOP) – 43 affordable units 	<p>The County provided assistance through the following programs during the planning period:</p> <ul style="list-style-type: none"> • HOP – 284 assistance loans were funded with a value of \$13,807,239. • MCC – 674 MCCs were issued with a value of \$212,335,943. • SCHFA – 164 loans were allocated. • AHOP – 35 affordable units were sold. <p>The County also issued 65 loans through the SCHFA funded First Home Program in 2017.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
14. Section 8 Rental Assistance	<p>Provide rental assistance to 4,000 extremely low- and very low-income households and homeless individuals and families in the unincorporated areas during the planning period (ongoing).</p> <ul style="list-style-type: none"> • Housing Choice Voucher – 3,800 households • Homeless Set Aside Program – 70 homeless individuals or families • Housing Opportunities for Persons with AIDS – 30 homeless persons with HIV/AIDS 	<p>LACDA's Housing Assistance Program monitors an allocation of 26,882 vouchers, which includes:</p> <ul style="list-style-type: none"> • 20,600 Housing Choice Vouchers • 1,425 Project Based Vouchers (PBV) • 3,192 Veterans Affairs Supportive Housing (VASH) vouchers • 34 Housing Opportunities for People with AIDS (HOPWA) vouchers • 203 Mainstream vouchers • 100 Non-Elderly Disabled (NED) voucher • 385 Family Unification program (FUP) vouchers • 16 Moderate Rehabilitation (MR) project-based vouchers.

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		<p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element. This program will include expanded outreach efforts to educate the public regarding California's Source of Income protection (SB 329), requiring landlords to accept public assistance (including HCVs) as a legitimate income source for rent payments.</p>
15. Family Self-Sufficiency Program	<ul style="list-style-type: none"> Assist 100 Section 8 recipients and public housing residents in the unincorporated areas to achieve self-sufficiency and homeownership during the planning period. Annually apply to foundations, corporations, and public and private organizations for funds to provide additional supportive services during the planning period (ongoing). 	<p>LACDA's Family Self-Sufficiency (FSS) program assists 315 HCV program participants and 58 Public Housing program residents for a total of 373 families enrolled in the FSS program. Out of the 373 families participating in FSS, there are 241 families with escrow accounts.</p> <p>The FSS program has a partnership with America's Job Center of California (AJCC). During 2020, 58 participants were referred to the AJCC. Out of those 58, 6 were in training, 5 have networked via networking webinars and the remaining participants were receiving ongoing job leads and resumé coaching.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
16. Housing Relocation for CalWORKs Participants Program	During the planning period, continue to provide one-time-only assistance to CalWORKs participants to ensure their success in obtaining/maintaining employment (ongoing).	<p>During this planning period, CalWORKs housing relocation data was not available. Further updates are not available.</p> <p>Continued Appropriateness</p> <p>This is not a housing program and is not included in the 2021-2029 Housing Element.</p>
17. Shelter Plus Care – Supportive Housing Program	Annually apply for funding to develop and expand the Continuum of Care strategy for homeless persons using Shelter Plus Care (S + C) – Supportive Housing Program (SHP) during the planning period (ongoing).	<p>LACDA's Continuum of Care program received nearly \$100 million in renewal funding for existing Continuum of Care projects during the planning period. Over \$17 million was allocated towards expansion projects. In FY 2019, LACDA received \$32,320,453 in renewal funding to support existing Continuum of Care projects. LACDA applied for \$32,320,453 in renewal funding for FY 2020 to support this program.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
18. Green Grant Program	Provide grants to low-income homeowners in unincorporated East Los Angeles for energy efficiency upgrades. Implementation funds will be annually allocated based on CDBG funding availability (ongoing).	<p>The Green Grant Program was discontinued in 2014.</p> <p>Continued Appropriateness</p> <p>This program is not included in the 2021-2029 Housing Element.</p>
19. Winter Shelter Program for Homeless (WSP)	Annually operate the 19 WSP sites (1,491 beds) throughout Los Angeles County (ongoing).	Of the 1,518 total beds, the County funded 846 WSP beds through the Emergency Solutions Grant Administration (ESG) and General Funds. In 2017, the County extended the program from 90 days to 120 days, extending from December to March. Bed capacity was expanded during extreme weather

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
		<p>conditions. The Los Angeles Homeless Services Authority (LAHSA) received funding from County Measure H, City General Funds, Continuum of Care (CoC), Community Development Block Grant (CDBG), ESG, the County Department of Public Social Services (DPSS), and the Independent Living Program. The increased funding allowed for a total of 4,518 total beds, and for all publicly funded shelters to move to 24-hour operation.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is incorporated into a new comprehensive homelessness program the 2021-2029 Housing Element.</p>
Neighborhood and Housing Preservation		
20. Ownership Housing Rehabilitation Assistance	<p>Assist 3,365 low-income households in the unincorporated areas during the planning period (ongoing).</p> <ul style="list-style-type: none"> • Single-Family Rehabilitation Loan Program – 125 households • Single-Family Home Improvement Program – 1,500 households • Residential Sound Insulation Program– 1,500 households • Handyworker Program – 240 households 	<p>The following number of loans/grants were completed during the planning period:</p> <ul style="list-style-type: none"> • Single-Family Rehabilitation Loan Program – 115 households • Single-Family Home Improvement Program – 612 households • Residential Sound Insulation Program – 2,869 households • Handyworker Program – 24 households <p>However, the Single-Family Home Loans and Handyworker Grant program were suspended in 2020 due to the COVID-19 pandemic.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
21. Public Housing Modernization Program	<p>Continue to improve and modernize the 1,945 public housing units in the unincorporated areas during the planning period (ongoing).</p>	<p>Modernization of existing public housing is an ongoing activity of the Housing Authority. The public housing stock was constantly undergoing modernization and rehabilitation during the planning period.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
22. Preservation of At-Risk Housing	<p>For the 2014-2024 period, 582 housing units for low-income households are at risk of converting to market rate. The following measures aim to preserve the at-risk units (ongoing):</p> <ul style="list-style-type: none"> • Annually update the status of at-risk housing projects, • Discuss preservation options with at-risk project owners, 	<p>The Preservation Unit (LACDA) and the County Department of Consumer and Business Affairs are implementing the Rent Stabilization and Mobilehome Rent Stabilization Ordinances, which were adopted in 2019. In addition, the County established the Emergency Preservation and Tenant Assistance Fund (EPTAF), assisting 82 low-income families to remain at their rental properties. Another 144 units with expiring affordability were preserved as affordable with CalHFA refinancing. LACDA plans to establish a Preservation Database to keep track of County programs that have expiring commitments to improve the preservation of affordable housing and work with the private builders to keep the housing</p>

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
	<ul style="list-style-type: none"> • Contact non-profit housing organizations about preserving the at-risk projects (by 2014), • Pursue funding from State and federal programs, • Allocate Section 8 Housing Choice Vouchers for households displaced due to the Section 8 project-based rental assistance expiration, • Provide notification of expiring units and engage tenants in the effort to preserve at-risk units. 	<p>at bond rates. LACDA has also completed a Displacement Study to prioritize the allocation of resources to areas where displacement is likely to occur.</p> <p>Continued Appropriateness</p> <p>These housing preservation and tenant protection programs are included in the 2021-2029 Housing Element.</p>
23. Foreclosed Property Tracking System	<p>The following measures seek to maintain an active GIS mapping database of properties entering the foreclosure process (ongoing):</p> <ul style="list-style-type: none"> • Develop a foreclosure database for mapping, tracking, and monitoring properties in foreclosure (by 2014), • Coordinate with County departments to detect foreclosures throughout the planning period, • Use the information to inform community-based planning efforts and place-based programs and strategies. 	<p>In 2014, Public Works established a mapping program for properties in the unincorporated areas that have a Notice of Default or Notice of Trustee Sale filed.² No updates have been made since 2014.</p> <p>Continued Appropriateness</p> <p>This program is not included in the 2021-2029 Housing Element. However, in the event that there is an increase in foreclosures, the County may reinstate the tracking system.</p>
Equal Housing Opportunity		
24. Fair Housing Program	<ul style="list-style-type: none"> • Annually allocate funding to support fair housing and tenant/landlord services during the planning period. • Provide training to County staff on fair housing laws and responsibilities (ongoing). 	<p>Fair housing and tenant services are ongoing. During the planning period, the County assisted 10,573 clients directly. An average of over 245,000 client contacts were made annually. The County distributed an average of over 15,000 pieces of education material per year. In first six months of 2020, the Housing Rights Center counseled 341 clients, opened 24 cases, and referred two cases in unincorporated Los Angeles County.</p> <p>The County's five-year Consolidated Plan includes provisions for additional fair housing. LACDA will use \$500,000 in non-federal County funds to execute an agreement with the Housing Rights Center at the start of the 2020 fiscal year. This agreement will provide expanded fair housing services, including education, outreach, investigation, training of testers, testing and legal consultation. The services will include outreach to residents and landlords to educate them on source of income protections.</p>

² PW's Land Records Viewer is available at: <https://pw.lacounty.gov/sur/landrecords/index.cfm?docType=TM>. Accessed July 2020.

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
		<p>Continued Appropriateness</p> <p>This program has been expanded to include relevant actions outlined in the Regional Analysis of Impediments to Fair Housing Choice.</p>
<p>25. Best Practices for Accessible Housing</p>	<ul style="list-style-type: none"> • Ensure compliance with accessibility design standards as required by the California Building Code, ADA Requirements, and Uniform Federal Accessibility Standards (UFAS). • Expand design requirements for or new construction for affordable and special needs multi-family housing projects funded by NOFA requiring: <ul style="list-style-type: none"> ○ 5% of dwelling units to be accessible for persons with mobility disabilities; and ○ 2% of units to be accessible to persons with hearing or visual disabilities. • Allow and support the inclusion of preferences for persons with disabilities having notice and opportunity to lease accessible/adaptable and visual/hearing impaired units funded with public funds (by end of 2014). • Complete ongoing research, review, and update best practices and requirements for leasing and management of accessible/adaptable units, in accordance with state and federal fair housing laws (by end of 2014). • Update NOFAs to require and encourage universal design principles, and, where appropriate, award extra points for projects that exceed minimum standards for accessibility (by end of 2014). • Improve housing inventory and registration of accessible units on the Los Angeles County Housing Resource Center website (ongoing). 	<p>In 2014, LACDA established measures to ensure funded projects complied with applicable regulations regarding accessible units, including ADA 201, CDC Chapter 11B, and Section 504 UFAs-compliant units for federally funded projects. NOFA provided incentives for universal design features to promote accessibility and required projects to include federal Low Income Housing Tax Credit financing. This effectively doubled the minimum percentage of accessible units because the state TCAC requires 10% of units to be accessible for persons with mobility impairments, and 4% of the units to be accessible to people with sensory impairments.</p> <p>The TCAC requirements continue to be used and meet current ADA standards for projects received funding from the 2018 NOFA process. All projects are subject to design review for compliance and are required to obtain a CASP certification.</p> <p>LACDA continued its practice of requiring that 10% mobility units and 4% sensory units meet current ADA standards for accessibility for projects that received funding under the 2018 Notice of Funding Availability process. Projects underwent design review for compliance with accessibility requirements, and all projects are required to obtain CASp certification of accessible units and project features. LACDA staff hold preliminary pre-leasing meetings at the start of construction as well as pre-leasing meetings held 90 days prior to lease-up in order to review affirmative marketing, signage requirements, tenant selection, and waiting list policies for the accessible units. Projects are required to register accessible units on the Los Angeles County Housing Resource Center website in advance of the application process.</p> <p>In addition, the LACDA continued to participate in a Cooperation Agreement with the City of Los Angeles Housing and Community Investment Department to maintain a City of Los Angeles partner page that would also be used to register accessible units, which further expands the inventory of accessible unit information available to the general public. Accessible units must be registered on the Los Angeles County Housing Resource Center (LAC-HRC) website prior to the application process. LACDA also participates in a Cooperation Agreement with the City of Los Angeles Housing and Community Investment Department (HCIDLA) to maintain a website for accessible unit registration.</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>

Table C-2: Review of 2014 Housing Element Programs

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26. Homeowner Fraud Prevention	<ul style="list-style-type: none"> Continue to provide fraud prevention counseling services to low- and moderate-income homeowners during the planning period. 	<p>There are no recent updates to the Homeowner Fraud Prevention program. The Department of Consumer and Business Affairs continues to provide ongoing fraud prevention counseling services to low- and moderate-income homeowners.</p> <p>Continued Appropriateness</p> <p>This is not included in the 2021-2029 Housing Element.</p>
27. Reasonable Accommodations Ordinance	<ul style="list-style-type: none"> Review reasonable accommodation practices and application forms to eliminate any barriers for individuals seeking accommodations and increase public awareness of the Reasonable Accommodations Ordinance (by 2014). Clarify the definition of “individual with a disability” and remove outdated application requirements in the Reasonable Accommodations Ordinance through the Technical Update of the Zoning Code (by 2015). Consider amendments to the notification and appeals provisions of the Ordinance to ensure the protection of the privacy rights of persons with disabilities through the Zoning Ordinance Update Program (by 2016). 	<p>The Board adopted the Technical Update to the Zoning Code in January 2019. The Technical Update includes a simplified definition of “individual with a disability.”</p> <p>Continued Appropriateness</p> <p>This program has been updated and is included in the 2021-2029 Housing Element.</p>
28. CEQA Streamlining	<ul style="list-style-type: none"> Design planning documents within urbanized areas near employment and transit to allow development with a streamlined environmental review, to the extent possible (ongoing). Develop tools to facilitate the use of applicable exemptions and streamlining provisions for infill projects and affordable housing projects in CEQA (by 2014). 	<p>In 2016, DRP revised and used the CEQA Streamlining Guidelines to determine whether projects are eligible for CEQA exemptions or streamlining. In 2018, DRP developed resources to understand the CEQA exemptions and streamlining provisions for affordable housing and infill projects. DRP also developed GIS layers of environmental data to assist the staff review of CEQA exemptions related to flood hazards, farmlands, wetlands, fire hazards zones, sensitive habitat areas, etc.</p> <p>Continued Appropriateness</p> <p>This routine staff function is not included in the 2021-2029 Housing Element as a separate program.</p>
29. Coordination and Implementation	<ul style="list-style-type: none"> Create and implement a streamlined entitlements procedure for all stages of the development process to expedite the development of affordable housing (by 2018). 	<p>The County established a working group dedicated to supporting projects for the Affordable Housing and Sustainable Communities Program. This group focuses on streamlining interdepartmental coordination around affordable housing and consists of staff from LACDA, DRP, Chief Sustainability Office, Department of Public Health, Chief Executive Office, Department of Parks and Recreation, and Public Works.</p> <p><u>Housing Data Tracking Table</u></p> <p>The County developed a housing data tracking tool utilizing EPIC-LA to capture the number of market rate and affordable residential units that are entitled and constructed every year.</p>

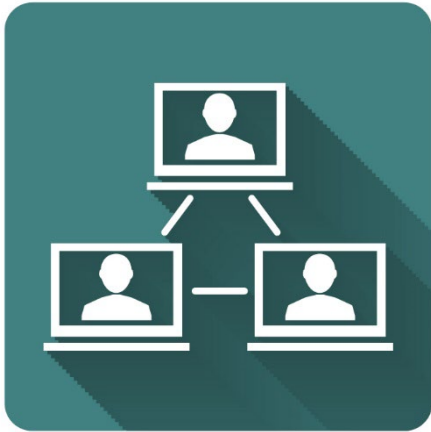
Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
		<p>The County will now more easily track the number of projects that utilize the County's Density Bonus Ordinance (DBO) and the additional units created by the DBO, as well as the number of new homeless/emergency shelter beds and family shelters that are approved every year.</p> <p><u>One-Stop Meetings</u></p> <p>DRP coordinates monthly "one-stop" meetings to provide feedback on projects before applicants submit a complete application. County agencies, such as Public Works, Fire Department, Department of Public Health, LACDA, and DRP provide written comments on draft plans and application materials to prevent delays and further streamline the review process. A representative from every agency attends the meetings, discusses comments with the applicant, provides a timeline for review, and provides information on fees.</p> <p><u>EPIC-LA e-Reviews</u></p> <p>DRP initiates the e-Reviews process with multiple County agencies after a complete application is received. County staff review the same digital file and provide comments and necessary clearances electronically. Applicants see the progress and submit revisions electronically.</p> <p><u>Affordable Housing Case Planners</u></p> <p>DRP designated a team of planners to serve as a single point of contact for all applicants providing affordable units. The planners review all affordable housing projects and counsel any applicant on the County's DBO. The team implemented AB 2162, SB 35 and AB 1763 to increase affordable and permanent supportive housing production countywide.</p> <p><u>Housing Policy Section</u></p> <p>A team of planners specializing in housing policy completed the By-Right Housing Ordinance, Interim and Supportive Housing Ordinance, Affordable Housing Preservation Ordinance, Inclusionary Housing Ordinance, Accessory Dwelling Unit Ordinance Update, Density Bonus Ordinance Update, and Compact Lot Subdivision Ordinance. The Housing Policy Section supports the Department's compliance with State laws by issuing informational memos, advising case planners, and creating implementation materials for staff and the public, such as applications, flow charts, and worksheets.</p> <p>Continued Appropriateness</p> <p>These routine staff functions and are not included in the 2021-2029 Housing Element as a separate program.</p>
30. Housing Element Annual Progress Report	<ul style="list-style-type: none"> • Prepare an annual report for submittal to HCD by April 1 during the planning period. 	<p>Housing Element annual progress reports were prepared annually throughout the planning period.</p> <p>Continued Appropriateness</p> <p>This routine staff function is not included in the 2021-2029 Housing Element as a separate program.</p>
31. Monitoring Housing Issues	<p>Ongoing efforts during the planning period will include, but are not limited to:</p> <ul style="list-style-type: none"> • Attending housing and legislative review conferences. 	<p>Various County departments and agencies continue to coordinate and provide input on proposed housing legislation and implementation, as well as to pursue opportunities for affordable housing.</p>

Table C-2: Review of 2014 Housing Element Programs

Program	Timeframe and Objectives	Progress/Status (Quantify if possible)
	<ul style="list-style-type: none"> • Attending training workshops. • Consulting with housing professionals through the Development Advisory Group, etc. • Working with the State to enhance and refine state mandated housing policies, including but not limited to the Mello Act, Affordable Housing Cost and Income Limits, the Density Bonus Law, and the Housing Element Law. • Participating in regional planning efforts coordinated by the Southern California Association of Governments (SCAG). • Interfacing with other County agencies and the public. 	<p>Ongoing efforts include, but are not limited to: attending housing and legislative review conferences; attending training workshops; consulting with housing professionals; working with the State to enhance and refine state mandated housing policies; participating in regional planning efforts coordinated by SCAG; and interfacing with other County agencies and the public. County staff also worked with the CEO to coordinate legislative responses.</p> <p>Continued Appropriateness</p> <p>This routine staff function is not included in the 2021-2029 Housing Element as a separate program.</p>

APPENDIX D: PUBLIC PARTICIPATION



The County implemented an engagement strategy tailored to the constraints set by the COVID-19 pandemic. This section summarizes outreach activities conducted as of November 18, 2021. Additional outreach will be conducted through Board of Supervisors adoption of the Housing Element, and will be summarized in the certified Housing Element.

The engagement featured 45 online workshops, stakeholder and community meetings that reached 813 attendees. County staff provided background on housing needs in the unincorporated areas, and how the Housing Element addresses those needs. Staff also explained the County's rezoning methodology and presented the interactive Story Map of proposed rezoning in communities.



County staff engaged all socio-economic segments of the community through flyers, emails, social media, a dedicated Housing Element website, an interactive Story Map, and a survey. The County received input from individuals and stakeholder groups with a wide range of experience and backgrounds. Stakeholder groups included community members, community serving organizations, developers, and housing advocates. Eight email blasts were sent to a mailing list that has grown to over 1,200 people, and the online survey produced a total of 349 responses.



In addition, County staff held nine public discussions on the Housing Element Update with representatives from the Board of Supervisors from September 2019 to October 2021, and provided seven updates to the Regional Planning Commission from July 2019 to April 2021. The Regional Planning Commission public hearing was held on September 1, 2021, and the Board of Supervisors public hearing was held on November 2, 2021.

MEETINGS AND COMMENTS RECEIVED

Housing Element Update meetings included nine countywide workshops hosted by DRP, 25 community group meetings, and 11 issue-focused stakeholder meetings.



The first workshop (July 30, 2020) introduced the Housing Element. The second and fourth workshops (September 22, 2020) were geared toward housing advocates, and the third workshop (January 23, 2021) provided additional information about the proposed Rezoning Program and also served as a scoping meeting for the Housing Element Update Environmental Impact Report.

Subsequent workshops were devoted to the “Big Ideas” of the Housing Element. These workshops provided background on the housing affordability crisis in the State and County. For these presentations, an artist created images to illustrate examples of how the crisis impacts the everyday lives of County residents (and how the Housing Element provides solutions).

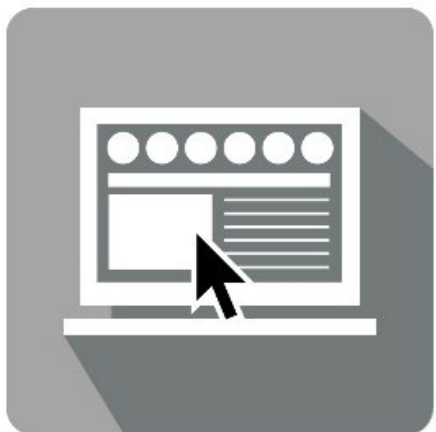
At community group meetings, County staff made presentations on the basic requirements of the Housing Element, presented the components of the County’s Housing Element as well as the rezoning Story Map, and introduced the CEQA process.

Key feedback gathered during the series of workshops is provided in **Table D-1**, which includes comments from meetings and surveys, and how they are addressed by policies and programs.

A full list of stakeholder groups engaged in the Housing Element Update is provided in **Table D-2** (Entities and Groups Engaged in the Preparation of the Housing Element). The list includes community groups, housing advocates, and building industry representatives.

Community feedback highlighted the high cost of housing. Issues that stemmed from this include increased homelessness, overcrowding, and high rents. Other comments focused on providing specialized housing for people experiencing homelessness. People living in rural areas expressed concerns over protecting environmentally sensitive land and avoiding urbanization. Residents of built-up suburban areas suggested rezoning underutilized commercial areas. Some community members sought housing that would support a vibrant commercial street, while another key concern was increased traffic, overdevelopment, and potential exposure to pollution caused by more density. Stakeholders asked if parking structures would be considered for conversion into housing, and if building standards could be strategically adjusted to make it easier to build multifamily housing. Other comments called for alignment with the Climate Action Plan greenhouse gas emission reduction goals. Participants suggested a streamlined, interagency (i.e., Regional Planning, Fire, and Public Works) approach to promoting housing development. Other recommendations included a labor standards and/or a community wealth policy in the Housing Element Update that would require family supporting wages, and skills training and job access to community members for future housing construction projects.

County staff also collected surveys and/or provided informational materials at 33 Parks After Dark events; at the annual community meeting convened by the LACDA (held virtually in 2020); and the 2020 Homeless Initiative Conference.

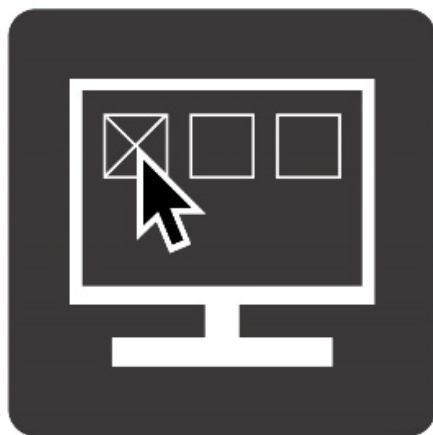


WEB SITE AND STORY MAP

The County's Housing Element Update web site (<https://planning.lacounty.gov/housing>) served as the clearinghouse for information. Visitors to the web site could find contact information for DRP's Housing Policy section, obtain general information about the Housing Element and project timeline, as well as review draft materials. DRP posted a preliminary draft of the Housing Element Update on June 7, 2021, and a public hearing draft on July 30, 2021, and provided the public with the opportunity to submit their comments on the Draft Housing Element via email. DRP posted revised public

hearing drafts on its web site on August 19 and August 26, 2021. The revised public hearing drafts for the Board of Supervisors hearing were posted online on October 13 and October 27, 2021.

The Housing Element web site includes an interactive Story Map to present the Rezoning Program. The Story Map combines text, maps, and illustrations, and can be read in English or Spanish. The Story Map provides background about the purpose and regulatory context of the Housing Element, as well as the County's rezoning methodology. The Story Map illustrates the County's natural constraints and rezoning prioritization criteria.



SURVEY

County staff also gathered community input via an anonymous online housing survey. The survey was available in English and Spanish and could be completed on a computer or mobile device. The survey questions were related to existing and future housing needs and how the County should meet those needs.

Respondents were provided opportunities for unrestricted feedback. The survey results reflected a variety of participant perspectives, including those of homeowners, tenants, and advocates, including for people with disabilities, dispersed over a large geographic area. Most respondents indicated that they live, work, or own property in the unincorporated areas. The survey

reached people across Los Angeles County, from areas characterized by dense multifamily housing near transit and freeways, to rural and semi-rural areas.

While the vast majority of respondents live in single-family homes, others live in apartments, townhomes, and condominiums. A few respondents selected accessory dwelling unit, senior housing, mobilehome park, RV, supportive housing, indicated that they were experiencing homelessness, or selected "other" living situations.

In response to the question "What types of housing would you like to see more of in your community?" the top three responses were single-family homes, followed by supportive housing and senior citizen housing. Mobilehome parks received the fewest number of responses.

When asked “What should the County do to address the housing crisis in the unincorporated areas?” the most frequently selected response was to help residents with housing costs, followed by protecting owners and renters from fraud, displacement, and discrimination, and helping people locate available housing.

The survey contained policy goals to which respondents could indicate their level of support or opposition. The most-supported policy goal was that housing should be livable and well-designed, and contribute to the quality of neighborhoods. The policy goal that received the highest level of “do not support” responses was “The unincorporated areas should have a variety of housing types, such as single family houses, apartments, townhouses, fourplexes, etc.”

The freeform survey responses reflected a wide range of experiences and perspectives. Some respondents did not support higher-density housing in their community due to concerns over community character, natural hazards, traffic, infrastructure, impact on services and/or crime. Others expressed a desire to build more housing on their own properties, such as ADUs and tiny homes, or more flexibility in building alternative housing types, such as shared housing. Other respondents wanted more affordable housing built, including supportive housing and housing for people with disabilities. Some respondents advocated for equal housing opportunities and enforcement of tenant protections, as well as financial assistance to help with housing costs. A copy of the survey is provided following **Table D-2**.

The following section identifies the goals, policies, and programs in the Housing Element, or existing ordinances, that address the public comments received.

SUMMARY OF COMMENTS RECEIVED

The general themes of public comments received are summarized. This summary does not attempt to reconcile the differences in opinions.

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
Opportunities for New Housing <ul style="list-style-type: none"> • Re-zoning of underutilized commercial/industrial areas and single-family areas for housing. • Rezoning of commercial uses into housing would lose vibrant commercial streets. • Conversion of parking into housing. • Housing on properties owned by religious organizations. • Transit-oriented development. • New housing opportunities should be distributed equitably and not overconcentrated in one community. • Underutilized or empty public land should be used to develop affordable housing. 	<p>The By-Right Housing Ordinance encourages infill development in urbanized areas by allowing multifamily housing by-right in commercial zones where appropriate (such as outside of Hillside Management Areas).</p> <p>The Adequate Sites for RHNA program outlines the County’s plan to rezone to accommodate the projected housing demand. The rezoning methodology was developed in accordance with State law, which requires local jurisdictions to address historic racial segregation and provide additional housing opportunities in higher-resource areas. The County’s methodology balances equity with other considerations, such as the amount of County land in naturally constrained and environmentally sensitive areas (such as Fire Hazard Severity Zones and Significant Ecological Areas).</p> <p>The Comprehensive Residential Design and Development Standards program has been revised to explore objective design</p>

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
<ul style="list-style-type: none"> New development should provide strong community benefits, such as affordable space for local community-serving small businesses, access to green space and parklets, and a strong pipeline of good jobs such as local and targeted hire programs. 	<p>standards that mitigate exposure to pollution and provide green space/parklets in underserved communities.</p> <p>The County implements labor requirements for housing construction that are mandated by federal, State and local policies. Projects seeking streamlined ministerial review under Government Code section 65913.4 are subject to prevailing wage requirements pursuant to the State Prevailing Wage Law if they are more than 10 units or receiving public funds (in the case of condominiums, low income housing tax credits). Projects of 75 or more units (or 50 or more units for projects approved on or after January 1, 2022) that are not 100% affordable to lower or very low income households must also use a skilled and trained workforce in order to be eligible for streamlined ministerial review under Government Code section 65913.4.</p> <p>The County's Local and Targeted Worker Hire Policy was adopted by the Board of Supervisors in October 2016 to ensure that local workers have employment opportunities on projects within their own communities. For affordable housing projects and mixed-use affordable housing projects that include County-funded facilities receiving funds administered by LACDA, and LACDA projects with a project budget greater than \$2.5 million, there shall be a best effort hiring goal of at least 30% qualified local residents and 10% Targeted Workers of California construction labor hours performed.</p> <p>Other relevant programs:</p> <p>Florence-Firestone Transit Oriented District Specific Plan</p> <p>East San Gabriel Valley Area Plan</p> <p>Metro Area Plan</p> <p>Adaptive Reuse Ordinance</p> <p>Development of County-Owned Sites</p> <p>Park Access for New Residential Development</p>
<p>Cost of Housing</p> <ul style="list-style-type: none"> High cost of housing; issues stemming from this concern include increased homelessness, overcrowding, and high rents. Homeownership not affordable. Housing for acutely low income households should be prioritized for short term implementation. Missing middle housing. 	<p>The County's Inclusionary Housing Ordinance requires that 5-20% of new units are affordable to extremely low, very low, or lower income tenants or middle-income home buyers. The number of affordable units that are required depends on the size of the project, whether it is rental or for-sale units, and the level of affordability provided. The County is updating its inclusionary feasibility study in an effort to include more communities. In addition, the County will enhance the existing inclusionary requirements in conjunction with Adequate Sites for RHNA program.</p> <p>The Compact Lot Subdivision Ordinance establishes provisions for compact lot subdivisions in multifamily residential zones. This allows for subdivisions to create "compact lots" that are less than the typical</p>

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
<ul style="list-style-type: none"> • Enforcement of affordable housing opportunities. • Mixed income housing. • Inclusionary housing for affordable housing. • Increase funding for affordable housing and specifically provide pre-acquisition funds. • Prioritize community land trusts. • Affordable housing should be made permanently affordable. 	<p>minimum area of 5,000 square feet and minimum lot width of 50 feet.</p> <p>The Density Bonus Ordinance also encourages developers to provide affordable housing by providing additional density and other zoning incentives. The County has updated its Density Bonus Ordinance to provide incentives for deeper affordability, including extremely low income units, and a longer affordability period.</p> <p>Policies 1.2, 1.3, 1.4, 2.1, 4.1, 5.1 and Goal 5 have been revised to include the acutely low income category. The implementation timeframe for the Housing for Acutely Low Income Households Program has been revised to a nearer-term (2024) to allow adequate time for the County to identify funds for a pilot project.</p> <p>The Pilot Community Land Trust program will pilot the acquisition of housing by community land trusts and nonprofit organizations to create long-term affordable housing. The program has been revised to reflect the County's commitment to acquire and rehabilitate at least five properties.</p> <p>Other relevant programs:</p> <p>State Housing Legislation Advocacy</p> <p>Marina del Rey Affordable Housing Policy</p> <p>Inclusionary Housing Feasibility and Implementation</p> <p>Missing Middle Program</p> <p>Countywide Affordable Rental Housing Development</p> <p>Section 8 Rental Assistance</p> <p>Preservation of At-Risk Housing</p> <p>Emergency Preservation and Tenant Assistance Fund</p> <p>Rent Stabilization and Mobilehome Rent Stabilization Ordinances</p> <p>Stay Housed L.A. County</p> <p>Affordable Housing Program Budget</p> <p>Homebuyer Assistance</p>
<p>Housing Condition</p> <ul style="list-style-type: none"> • Provide assistance to homeowners who wish to expand or renovate their homes. • The County should strengthen systematic code enforcement. 	<p>Ownership Housing Rehabilitation Assistance</p> <p>Systematic Code Enforcement</p> <p>Multifamily Housing Rehabilitation</p>
<p>Housing Types</p>	<p>The Interim and Supportive Housing Ordinance encourages the development of housing for people experiencing homelessness</p>

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
<ul style="list-style-type: none"> • All types of housing, including affordable housing, are needed. • RVs can be an affordable housing option. • Streamlining ADUs. • Tiny homes. • Small units to accommodate singles and couples. • Housing with three or more bedrooms to accommodate families. • Shared housing and co-living models for seniors and the individuals experiencing homelessness. 	<p>(shelters, transitional housing, and supportive housing), and to support temporary vehicle living. The ordinance includes provisions to streamline shelter and accessory shelter review by allowing them by-right in certain zones where appropriate, and expand parking options for recreational vehicles, among other provisions.</p> <p>A number of Housing Element programs foster a diverse housing stock throughout the unincorporated areas. Relevant programs include:</p> <p>Accessory Dwelling Unit Construction</p> <p>Missing Middle Housing</p> <p>Housing Types Definitions Program</p> <p>Alternative Housing Types and Building Methods Program</p>
<p>Special Needs Housing</p> <ul style="list-style-type: none"> • A need for specialized housing for people experiencing homelessness. • Affordable housing should be prioritized for people experiencing homelessness. • Housing choices for seniors who would like to stay in the community but may want to downsize. • Housing with universal design for persons with disabilities. • Supportive housing is needed. • Design housing to incorporate assisted living arrangements for developmentally disabled adults. 	<p>The Interim and Supportive Housing Ordinance encourages the development of housing for people experiencing homelessness (shelters, transitional housing, and supportive housing), and to support temporary vehicle living. The Ordinance includes provisions to streamline shelter and accessory shelter review by allowing them by-right in certain zones where appropriate, and expand parking options for recreational vehicles, among other provisions.</p> <p>Other relevant programs:</p> <p>Best Practices for Accessible Housing</p> <p>Rapid Re-Housing and Shallow Subsidy Programs</p> <p>Safe Parking</p> <p>Services for People Experiencing Homelessness and Homelessness Prevention</p> <p>Supportive Housing Programs</p> <p>Temporary Housing Programs</p> <p>Reasonable Accommodations Ordinance Update and Removal of Zoning Barriers to Fair Housing</p>
<p>Housing and Density</p> <ul style="list-style-type: none"> • Concern with traffic caused by increased density. • Upzoning will worsen parking issues and create incompatibility with surrounding neighborhoods. • Inadequate infrastructure, services, and parks in urbanized areas. • Overcrowding. 	<p>The Adequate Sites for RHNA program will be implemented through future planning efforts, not directly through the Housing Element. One potential strategy to implement the Rezoning Program is through local area plans, which will also include capital improvement plans.</p> <p>For development in the R-5 (High Density Multiple Residence) or Mixed Use Zone, the County's Zoning Code allows the County to require the applicant to conduct technical studies on a project's traffic and sewer impacts, provide certification that water facilities</p>

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
<ul style="list-style-type: none"> If future projects on rezoned parcels are to be built at the maximum allowable density, building height and massing will not be compatible with existing neighborhoods. 	<p>are adequate, and require the applicant to construct or fund necessary infrastructure improvements.</p> <p>Other relevant programs:</p> <p>Residential Parking Program Analysis and Code Update</p> <p>Park Access for New Residential Development</p> <p>Comprehensive Residential Design and Development Standards</p> <p>These programs will address creative parking solutions, providing amenities, and enhancing neighborhood conditions.</p>
<p>Displacement</p> <ul style="list-style-type: none"> Upzoning would have an impact on properties that are currently tenant-occupied. Development on upzoned sites should not occur without affordability requirements. Balance between tenant protection and new production. The County should adopt a countywide tenant opportunity to purchase ordinance so that tenants have the opportunity to achieve ownership of their long-time homes and therefore remain in their communities without the fear of being priced out. The County must strengthen tenant protections by adopting an economic displacement assistance ordinance to support low income tenants who are priced out of their homes because their homes are not covered under the existing Rent Stabilization Ordinance (RSO). The County should strengthen the County's RSO program by committing to strengthening the capacity of the Department of Consumer and Business Affairs to promptly support residents who qualify for emergency relocation or permanent relocation. The County should include enforcing recently enacted tenant anti-harassment protections as part of the RSO Program. The Housing Element should also improve how harassment complaints are tracked and reported, including providing access to 	<p>The Affordable Housing Preservation Ordinance requires that units that are or were on the site that were occupied by extremely low, very low, or lower income tenants, be replaced with units that are affordable at the same income level or below.</p> <p>The Adequate Sites for RHNA program is focused on commercial corridors, where most of the existing uses are non-residential. The County will enhance inclusionary requirements in conjunction with the Adequate Sites for RHNA program.</p> <p>In addition to the County's rent stabilization and tenant protections, there are other tools available to protect existing residents and ensure that affordable housing is included in new development.</p> <p>The Tenant Opportunity to Purchase Ordinance was initiated by the Board of Supervisors on August 10, 2021, and has been added as a Housing Element implementation program.</p> <p>The Rent Stabilization and Mobile Home Rent Stabilization Ordinances program has been revised to clarify that, at the direction of the Board, these ordinances will be strengthened along with the County's capacity to address gaps in tenant protections for non-rent-stabilized units, enforcement of anti-harassment provisions, relocation assistance, and other emerging issues as needed. In addition, the Stay Housed L.A. County program is currently being evaluated on the success of the program to date at achieving desired outcomes, and on its future programmatic and funding needs.</p> <p>Other relevant programs:</p> <p>Inclusionary Housing Feasibility and Implementation</p> <p>Metro Area Plan Preservation of At-Risk Housing</p> <p>Preservation Database</p> <p>Anti-Displacement Mapping Tool and Displacement Risk Study</p> <p>Emergency Preservation and Tenant Assistance Fund</p>

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
<p>a database of tenant complaints and adequately documenting when tenants are being threatened with harassment.</p> <ul style="list-style-type: none"> • The County must expand StayHoused LA and adopt a codified right to counsel for tenants in eviction proceedings as a program in the Housing Element. • The County should enact an annual cap on demolition and condo conversions of RSO units. 	
<p>Fair Housing</p> <ul style="list-style-type: none"> • Strengthen tenant protections against discrimination, including discrimination based on source of income, eviction history, credit, rent or utility debt, or criminal history. • The County should ensure that housing developers conduct local outreach and market new units in the most commonly spoken languages in the community. 	<p>The Affirmatively Furthering Fair Housing Program outlines the County's multiple efforts to promote equal access to housing. The program has been revised to explore adding protections for eviction history, credit, rent or utility debt, or criminal history.</p> <p>The Equity Audit of Land Use Plans, Zoning Code and Infrastructure Planning program has been revised to include that LACDA will update the County's standard affordability covenant language to ensure that housing developers conduct local outreach and market new units in the most commonly spoken languages in the community.</p>
<p>Governmental Constraints</p> <ul style="list-style-type: none"> • Building standards could be strategically adjusted to make it easier to build multifamily housing. • Onus is on the architect and developer to navigate approvals from multiple agencies. Online one-stop digital plan submittal is a basic need for both private and non-profit developers. • County's entitlement process for housing developments is lengthy and complicated. • A streamlined, interagency (i.e., Regional Planning, Fire, and Public Works) approach to promoting housing development; break down silos between public agencies. • By-right approval and CEQA streamlining. • Centralized database of vacant land. • Compact lots. 	<p>The Compact Lot Subdivision Ordinance establishes provisions for compact lot subdivisions in multifamily residential zones. This allows for subdivisions to create "compact lots" that are less than the typical minimum area of 5,000 square feet and minimum lot width of 50 feet.</p> <p>The By-Right Housing Ordinance encourages infill development in urbanized areas by allowing multifamily housing by-right in commercial zones where appropriate (such as outside of Hillside Management Areas).</p> <p>Other relevant programs:</p> <ul style="list-style-type: none"> Comprehensive Residential Design and Development Standards Residential Parking Program Analysis and Code Update Adaptive Reuse Ordinance Housing Types Definitions Program Title 21 Update Program Performance Tracking

Table D-1: Summary of Comments and Housing Element Response

Comments	Ongoing Efforts and Housing Element Programs
<ul style="list-style-type: none"> Make it faster and easier to bring unpermitted construction into compliance. 	Annual Zoning Code Technical Update
Environmental Protection <ul style="list-style-type: none"> Concern regarding maintaining environmentally sensitive land and avoiding urbanization. Location for new housing should align with Climate Action Plan greenhouse gas emission reduction goals. 	Climate Action Plan Safety Element Implementation: Reducing Wildfire Risk
Engagement <ul style="list-style-type: none"> County should reach out to the 50 percent of residents who are renters to solicit support for multifamily housing. Inadequate time to provide input. 	Throughout the Housing Element Update process, the County continued to offer ample opportunities for community input and improve methods of outreach.

LIST OF GROUPS REACHED

Table D-2: Entities and Groups Engaged in the Preparation of the Housing Element

Community Groups
Eastside LEADS
Maravilla Community Advisory Committee
Crescenta Valley Town Council Land Use Committee
El Camino Village Community Watch Association
East San Gabriel Valley Area Plan Stakeholder Committee
Monrovia-Arcadia-Duarte Town Council
United Homeowners Association II
Crescenta Valley Civic Association
Health Innovation Community Partnership
Lennox Coordinating Council
Rowland Heights Community Coordinating Council
West Rancho Community Action Group
Altadena Town Council
Ladera Heights Civic Association
Florence-Firestone Community Leaders
Hacienda Heights Improvement Association
Workman Mill Association

Table D-2: Entities and Groups Engaged in the Preparation of the Housing Element

Walnut Park Residents Association
Bassett Neighborhood Watch
Del Aire Neighborhood Association
East Rancho Dominguez Neighborhood Association
Juntos Florence-Firestone Together
Southwest Community Association
Friends and Neighbors Community Club
Palo Del Amo Woods Homeowners Association
Del Amo Action Committee
Community Coalition
Three Points-Liebre Mountain Town Council
Sun Village Association
Acton Town Council
Roosevelt Town Council
Leona Valley Town Council
Littlerock Town Council
Green Valley Town Council
Fairmont Town Council
Antelope Acres Town Council
Association of Rural Town Councils
Pearblossom Town Council
Lake Los Angeles Town Council
Housing Advocates and Building Industry
Abundant Housing LA
Alliance for Community Transit - LA (ACT-LA)
Bridge Housing
cd-rg
Clifford Beers Housing
Communities for a Better Environment
Community Power Collective
Corporation for Supportive Housing
Craig Lawson & Co., LLC
Habitat 4 Humanity
Hollywood Housing
LA Thrives
LA County Commission on Disabilities
LA Forward
Latham & Watkins
League of Women Voters
Legal Aid Foundation of Los Angeles (LAFLA)
LINC Housing
PATH Ventures

Table D-2: Entities and Groups Engaged in the Preparation of the Housing Element

Public Counsel
Shelter Partnership
Southern California Association of Nonprofit Housing (SCANPH)
Southwest Regional Council of Carpenters
Strategic Actions for a Just Economy (SAJE)
three6ixty
The Two Hundred
Urban Consulting Group
Building Industry Association of Southern California – Los Angeles/Ventura Chapter
Greater Antelope Valley Association of Realtors
Greater LA Realtors Association
LA County Business Federation (BizFed)
Valley Industry & Commerce Association
YIMBY Law

HOUSING ELEMENT SURVEY (ENGLISH AND SPANISH)

A copy of the survey is provided on the following pages.



Housing Element Update Survey

The County of Los Angeles is currently updating the Housing Element of the General Plan. The County's Housing Element serves as a policy guide to address housing needs for the unincorporated areas of Los Angeles County. 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. Your voice is important in this process. We invite you to help inform the Housing Element Update by answering the following questions.

1. Where do you live? (ZIP code)

The value must be a number

2. Do you live, work, or own property in an unincorporated community of Los Angeles County?

An unincorporated community is an area that is not within the City of Los Angeles or any other city.

- ☐ Yes, I live, work, or own property in an unincorporated community of Los Angeles County
- ☐ No, I do not live, work, or own property in an unincorporated community of Los Angeles County
- ☐ I don't know

3. If you live, work, or own property in an unincorporated community of Los Angeles County, which community(ies)? Please explain below.

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4. What type of housing do you live in?

- ☐ Apartment
 - ☐ Condominium
 - ☐ Single-family home
 - ☐ Townhome
 - ☐ Fourplex/triplex
 - ☐ Duplex
 - ☐ Senior citizen housing
 - ☐ Mobilehome park
 - ☐ Vehicle/RV
 - ☐ Supportive housing
 - ☐ Interim/transitional housing (for example, shelter)
 - ☐ Accessory dwelling unit (ADU)
 - ☐ Experiencing homelessness (unsheltered)
 - ☐
- Other

5. What types of housing would you like to see more of in your community? Choose all that apply.

- ☐ Apartments
 - ☐ Condominiums
 - ☐ Single-family homes
 - ☐ Townhomes
 - ☐ Fourplexes/triplexes
 - ☐ Duplexes
 - ☐ Senior citizen housing
 - ☐ Mobilehome parks
 - ☐ Supportive housing
 - ☐ Interim/transitional housing (for example, shelters)
 - ☐ Accessory dwelling units (ADUs)
 - ☐
- Other

6. What should the County do to address the housing crisis in the unincorporated areas?

Choose your top three policy areas.

- ☐ Allocate more money to build housing
- ☐ Remove red tape to help housing get built faster
- ☐ Help people locate available housing
- ☐ Help residents with housing costs
- ☐ Encourage more housing next to transit and jobs
- ☐ Encourage innovation in housing design and development
- ☐ Protect owners and renters from fraud, displacement, and discrimination
- ☐

Other

7. The County will identify several goals to address housing needs in unincorporated areas. Please indicate your level of support for the following goals:

	Support	Somewhat support	Do not support
The unincorporated areas should have a variety of housing types, such as single family houses, apartments, townhouses, fourplexes, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The unincorporated areas should have housing to accommodate all incomes and special needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing should be livable and well-designed, and contribute to the quality of neighborhoods.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preserving existing housing, particularly affordable housing, is just as important as building new housing.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing should be accessible to people with disabilities without discrimination.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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8. Additional comments/suggested additional goals?

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5/5/2021

**Housing
Element Update**



Encuesta Para la Actualización del Capítulo de Vivienda

El Condado de Los Ángeles está actualizando el Capítulo de Vivienda del Plan General. El Capítulo de Vivienda sirve como una guía de políticas para abordar la necesidad de vivienda para las áreas no incorporadas del Condado de Los Ángeles. El Capítulo de Vivienda del Condado se centra principalmente en asegurar vivienda decente, segura, sana y asequible para los residentes actuales y futuros de las áreas no incorporadas, incluso los con necesidades especiales. Su voz es importante en este proceso. Le invitamos a que nos ayude formar la actualización del Capítulo de Vivienda con sus respuestas a las siguientes preguntas.

1. ¿Dónde vive? (código postal)

El valor debe ser un número.

2. ¿Vive, trabaja, o es dueño/a de propiedad en una comunidad no incorporada del Condado de Los Ángeles?

Una comunidad no incorporada es un área que no está dentro de la Ciudad de Los Ángeles ni otra ciudad.

- ☐ Sí, yo vivo, trabajo, o soy dueño/a de propiedad en una comunidad no incorporada del Condado de Los Ángeles
- ☐ No, no vivo, trabajo, ni soy dueño/a de propiedad en una comunidad no incorporada del Condado de Los Ángeles
- ☐ No sé

3. Si vive, trabaja, o es dueño/a de propiedad en una comunidad no incorporada del Condado de Los Ángeles, por favor indiquela(s) comunidad(es) abajo.



4. ¿En qué tipo de vivienda vive usted?

- ☐ Apartamento (de 5 o más unidades de vivienda)
 - ☐ Condominio
 - ☐ Casa unifamiliar
 - ☐ Casa adjunta
 - ☐ 4-plex/triplex
 - ☐ Duplex
 - ☐ Vivienda para personas de la tercera edad
 - ☐ Comunidad de casas móviles
 - ☐ Vehículo/ Vehículos Recreacionales
 - ☐ Vivienda con servicios de apoyo
 - ☐ Vivienda interina/temporal (por ejemplo, refugio)
 - ☐ Vivienda secundaria a la residencia principal (ADU)
 - ☐ Sin hogar (sin refugio)
 - ☐
- Otras

5. ¿Cuáles tipos de vivienda le gustaría ver más en su comunidad? Marque todos que aplican.

- ☐ Apartamentos
 - ☐ Condominios
 - ☐ Casas unifamiliares
 - ☐ Casas adjuntas
 - ☐ 4-plex/triplex
 - ☐ Duplex
 - ☐ Viviendas para personas de la tercera edad
 - ☐ Comunidades de casas móviles
 - ☐ Viviendas con servicios de apoyo
 - ☐ Viviendas interinas/temporales (por ejemplo, refugios)
 - ☐ Viviendas secundarias a las residencias principales (ADU)
 - ☐
- Otras

6. ¿Qué debería hacer el Condado para abordar la crisis de vivienda en las áreas no incorporadas? Marque sus tres políticas más preferidas.

- ☐ Asignar más fondos para construir viviendas
- ☐ Simplificar los requisitos y el proceso de aprobación de permisos para la construcción de viviendas, para que se construyan más rápidamente
- ☐ Ayudar a la gente a encontrar viviendas disponibles
- ☐ Ayudar a la gente con sus costos de vivienda
- ☐ Animar más vivienda cerca de transporte público y empleo
- ☐ Animar innovación en el diseño y construcción de viviendas
- ☐ Proteger a los dueños e inquilinos de fraude, desplazamiento, y discriminación

☐

Otras

7. El Condado identificará varias metas para abordar las necesidades de vivienda en las áreas no incorporadas. Por favor indique el nivel de su apoyo para las siguientes metas:

	Apoya	Apoya un poco	No apoya
Las áreas no incorporadas deben tener una variedad de tipos de vivienda, como casas unifamiliares, apartamentos, casas adjuntas, 4-plex, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Las áreas no incorporadas deben tener viviendas para todos ingresos y necesidades especiales.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Viviendas deben ser habitables y bien diseñadas, y contribuir a la calidad de los vecindarios.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
La preservación de viviendas que ya existen, particularmente viviendas asequibles, es importante tal como la construcción de nuevas viviendas.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Viviendas deben ser accesibles a personas con discapacidades, sin discriminación.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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8. ¿Más comentarios/sugerencias de otras metas?

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APPENDIX E: AFFIRMATIVELY FURTHERING FAIR HOUSING

ASSESSMENT OF FAIR HOUSING (AFH)

In 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. 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 jurisdiction’s fair housing enforcement and outreach capacity;
- An analysis of segregation patterns and disparities in access to opportunities;
- An assessment of contributing factors;
- An identification of fair housing priorities and goals; and
- Strategies and actions to implement those priorities and goals.

The AFFH rule was originally a federal requirement applicable to entitlement jurisdictions (with populations over 50,000) that can receive HUD Community Planning and Development (CPD) funds directly from HUD. Before the 2016 federal rule was repealed in 2019, entitlement jurisdictions were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI). AB 686 states that jurisdictions can incorporate findings from either report into the Housing Element.

Data Availability

For the purpose of HUD CPD funds (CDBG, HOME, and ESG),³ the County of Los Angeles functions as the lead agency to receive these funds on behalf of 48 small cities (with population less than 50,000) and the unincorporated areas. Collectively, this geography is known as the Urban County. Much of the data provided by HUD for the purpose of housing and community development, disproportionate needs, and the AFFH analysis is based on this collective Urban County geography. Separate data for just the unincorporated areas is not available without extensive manipulation, which tends to exaggerate the margins of error. For the Housing Element Needs Assessment, the County utilized the complex methodology (subtracting 88 cities from the County level data) to generate estimates on demographic and housing characteristics for unincorporated Los Angeles County. This methodology can introduce larger margins of errors and the resultant estimates are used as points of reference only. Using the general estimates for this detailed assessment of fair housing may not be appropriate.

Similarly, LACDA contracts with the Housing Rights Center (HRC) for fair housing outreach and enforcement services. Currently, HRC’s contracted scope of services does not include reporting fair housing records by geographic area (separating records for individual cities and the unincorporated areas). The lack of specific fair housing records by geographic area makes it difficult for the County to understand the nature and extent of housing discrimination and to tailor appropriate resources. This Housing Element includes an action to request a change in the scope of fair housing services in future years.

Assessment of Fair Housing Issues

This section summarizes the 2018 Analysis of Impediments to Fair Housing Choice (AI) prepared by the Los Angeles County Development Authority (LACDA) for the Urban County, and supplements it with additional data as available and appropriate.

Fair Housing Enforcement and Outreach

Los Angeles County is subject to state and federal laws related to fair housing. Federal fair housing laws, including the Federal Fair Housing Act of 1968 (FHA) and the Fair Housing Amendments Act of 1988 (FHAA), protect residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, and familial status. The County complies with the California Fair Employment and Housing Act (FEHA), prohibiting discrimination based on marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination in addition to the groups protected under federal fair housing legislation.

Unincorporated Los Angeles County is part of the Urban County program, which contracts with the Housing Rights Center (HRC) for fair housing services. In FY 2019-2020, HRC received 2,038 calls for general housing inquiries and 356 calls related to fair housing inquiries. Among the 356 inquiries, fair housing issues relating to disabilities (physical and mental) represented the majority (82 percent) of the protected classifications. Trailing distantly behind was source of income at 5 percent of the inquiries.

The HCD AFFH Data Viewer provides HUD Office of Fair Housing and Equal Opportunity cases at the County level. **Table E-1** compares FHEO cases in Los Angeles County in 2010 and 2020. The total number of cases have decreased significantly since 2010. In 2010 and 2020, cases with a disability bias were the most common. Cases with a disability bias represented 66 percent of all cases in 2020, compared to only 36 percent in 2010. The proportion of cases with a racial or familial status bias has decreased over the last 10 years.

Table E-1: Los Angeles County FHEO Cases (2010-2020)

	2010		2020	
	Cases	Percent	Cases	Percent
with a Racial Bias	80	27%	27	21%
with a Disability Bias	106	36%	86	66%
with a Familial Status Bias	58	20%	9	7%
Total Cases	291	100%	130	100%

Source: HCD AFFH Data Viewer (HUD FHEO 2010-2020), 2021.

³ Community Development Block Grants (CDBG); HOME investment Partnership (HOME); and Emergency Solutions Grants (ESG).

During FY 2019-2020, 83 fair cases were opened, with the majority being reconciled or withdrawn. Two cases were referred to litigation and three cases were referred to the Department of Fair Employment and Housing (DFEH). Among the 83 cases opened, physical disability (47 percent), mental disability (22 percent), and source of income (19 percent) represented the majority of the protected classes.

Annually, HRC conducts outreach and education throughout the Los Angeles Urban County. Typical activities include Public Service Announcements/media/advertisements; community presentations; literature distribution; and management trainings.

Fair Housing Considerations for Housing Element Update Outreach

The County's outreach strategy incorporated fair housing considerations. Six outreach meetings were focused on communities with R/ECAPs. Residents in communities with R/ECAPs raised concerns over balancing the need for affordable housing with issues, such as parking and traffic. Other feedback included support for streamlining ADUs. The Metro Area Plan, Westside Area Plan, Accessory Dwelling Unit Construction Program, Comprehensive Residential Design and Development Standards Program, and Residential Parking Program Analysis and Code Update address these specific concerns.

As described in Appendix D, the County reached out to residents of urban, suburban, and rural communities. The County held five workshops, one for each Supervisorial District, to present the “Big Ideas” of the Housing Element. These workshops provided background on the housing affordability crisis in the State and County and how the Housing Element can address the crisis. The County presented the Housing Element at community-specific meetings in all seven Planning Areas with units in the Sites Inventory and Rezoning Program. This includes ten community-specific meetings in the Metro Planning Area, covering the neighborhoods of East Los Angeles, West Rancho Dominguez, Walnut Park, and Florence-Firestone, where there are numerous challenges to fair housing. In addition, staff engaged fair housing advocates with two Countywide focus group meetings and additional follow-up meetings, as well as a tabling event at the 2020 conference of the Los Angeles County of Los Angeles Homeless Initiative. A list of groups reached during Housing Element Update outreach is provided in Appendix D (**Table D-2**).

The County’s outreach program was designed to also engage Spanish speakers. County staff translated the Housing Element informational flyer, survey, and Rezoning Program interactive Story Map, presented bilingual slides at outreach meetings, provided a dedicated phone line for Spanish-language inquiries, and made interpretation available at workshops and meetings. A preliminary survey for unincorporated areas residents was also translated into Spanish and Mandarin.

Furthermore, advocates for people with disabilities were also engaged in the Housing Element, attending outreach meetings and helping with survey distribution.

Integration and Segregation

Race and Ethnicity

HUD tracks racial or ethnic dissimilarity⁴ trends for Urban County programs. Dissimilarity indices show the extent of distribution between two groups, in this case racial/ethnic groups, across census tracts. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

The indices for the Los Angeles Urban County and Los Angeles County region from 1990 to 2020 are shown in **Table E-2**. Dissimilarity between non-White and White communities in the Los Angeles Urban County and throughout the Los Angeles County region has worsened since 1990. For both Los Angeles Urban County jurisdictions and the entire county, dissimilarity between Black and White communities has improved, while dissimilarity between Hispanic/White and Asian or Pacific Islander/White communities has worsened. Based on HUD’s index, segregation between Asian or Pacific Islander/White Los Angeles Urban County communities is moderate, while segregation between non-White/White, Black/White, and Hispanic/White Los Angeles Urban County communities is high.

Table E-2: Racial or Ethnic Dissimilarity Trends

	1990	2000	2010	2020
Los Angeles Urban County				
Non-White/White	53.33	53.62	53.85	55.87
Black/White	68.29	63.51	60.24	64.21
Hispanic/White	62.81	64.99	64.38	65.12
Asian or Pacific Islander/White	41.58	48.57	49.62	52.79
Los Angeles County Region				
Non-White/White	55.32	55.50	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78

Source: HUD AFFH Data, 2020.

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. According to the 2012-2016 ACS, approximately 76 percent of the households (or 81 percent of the population) in the unincorporated areas belong to a non-White group. **Figure E-1: Racial/Ethnic Majority by Census Tract** shows the geographic concentrations of various groups. For example, San Gabriel Valley (east and west) continues to expand as a subregion that attracts significant numbers of Asian residents. The availability

⁴ Index of dissimilarity is a demographic measure of the evenness with which two groups are distributed across a geographic area. It is the most commonly used and accepted method of measuring segregation.

of different Asian-focused services – such as grocery stores and restaurants – has resulted in a subregion that is primarily Asian. While Hispanic residents have concentrated in several locations (Palmdale, Gateway, and San Gabriel Valley), Hispanic and Asian residents also tend to live in neighboring communities in the San Gabriel Valley. The South Los Angeles area continues its historical trend as an area with a high concentration of Black residents. However, in recent decades, many Black residents have moved out of Los Angeles County and into Riverside and San Bernardino counties in search of more affordable housing.

Figure E-1: Racial/Ethnic Majority by Census Tract

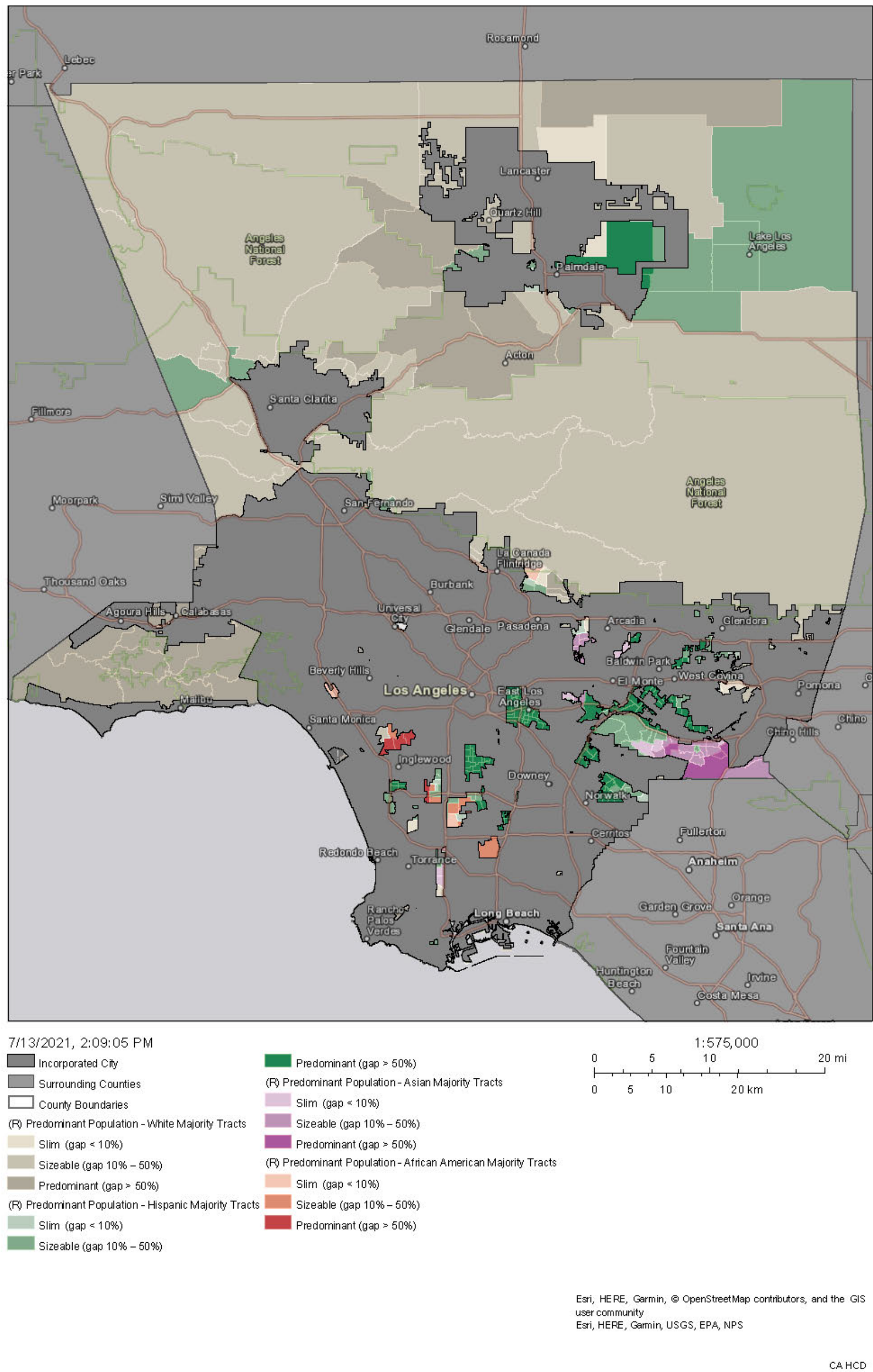


Figure E-2 combines the concentration of all non-White populations in 2018. Communities where racial/ethnic minorities are the predominant population are generally located in the southern, southeastern, and northeastern areas of Los Angeles County. Many of these areas have Hispanic/Latino predominant populations. Unincorporated areas in the south central areas are predominantly Black, and southeastern areas are predominantly Asian. According to the HCD AFFH Data Viewer, since 2010, a majority of unincorporated Los Angeles County

communities have seen increases in racial/ethnic minority populations. The following unincorporated areas have the largest non-White majority populations:

- Lennox, Florence-Firestone, Walnut Park, Willowbrook, East Rancho Dominguez, East Los Angeles, West Whittier-Los Nietos, South Whittier-Sunshine Acres, Avocado Heights, West Puente Valley, Valinda, South San Jose Hills, and northeastern communities in the Antelope Valley have Hispanic majority populations.
- View Park, Windsor Hills, and West Athens-Westmont have African American majority populations.
- Hacienda Heights and Rowland Heights have Asian majority populations.

The history and characteristics of the racially/ethnically concentrated unincorporated communities, including East Los Angeles, Ladera Heights, View Park/Windsor Hills, Rowland Heights, Altadena, Sun Village, Florence-Firestone, and Willowbrook are described below.

East Los Angeles (Metro Planning Area)

In the 1920's, the population of immigrants from Mexico increased in East Los Angeles due to employment opportunities. The area's proximity to commerce and industry near downtown Los Angeles made it a convenient place to live and raise a family. The Chicano activism movement began in East Los Angeles during the late sixties and early seventies because of discrimination by neighboring communities. East Los Angeles has retained its character over the last 60 years and is studied and documented as a long-standing Mexican American community. The Los Angeles Times "Mapping L.A." survey found East Los Angeles to be the least ethnically diverse community in Los Angeles County. Over 97 percent of the residents are of Hispanic origin with 87 percent speaking Spanish as a first language. As shown in **Figure E-1**, the population of East Los Angeles today continues to be prominently Hispanic. East Los Angeles offers the services, amenities, and social ties that are important to Hispanic residents, particularly recent immigrants. In 2010, most block groups in this area were comprised of fewer than 60 percent racial/ethnic minorities. The non-White population has significantly increased since; more than 80 percent of the population in these block groups now belong to a racial/ethnic minority population.

Ladera Heights, View Park/Windsor Hills (Westside Planning Area)

African Americans were prevented from purchasing property or living in the area until racially restrictive covenants were invalidated in 1948. Today, approximately 73 percent of residents in Ladera Heights and View Park/Windsor Hills are African American. Ladera Heights and View Park/Windsor Hills are part of a band of neighborhoods that comprise one of the largest, wealthiest, most educated geographically contiguous historically black communities in the western United States. Ladera Heights and View Park/Windsor Hills are recognized as the wealthiest black communities in the country, and countless African American celebrities and sports personalities have called the area home. While the population today remains largely African American, there is a demographic shift underway of new residents due to the area's convenient proximity to well-paying jobs and recreational amenities in nearby beach communities and the Los Angeles basin. Block groups in this area have had higher concentrations of racial/ethnic minority populations since 2010. In 2010, between 40 and 80 percent of the population in most block groups belonged to a racial or ethnic minority group. In comparison, more than 80 percent of the population in most block groups were non-White in 2018.

Rowland Heights (East San Gabriel Valley Planning Area)

Rowland Heights was known as "Little Taipei" in the late 20th century following an influx of immigrants from Taiwan. Rowland Heights and neighboring communities, such as Hacienda Heights, have also attracted upper-class immigrants from China and South Korea. Rowland Heights grew significantly during the 1990s, becoming one of the cultural centers for the Chinese diaspora in Los Angeles County. In recent years, many Chinese immigrants have purchased homes and started small businesses in the area. The San Gabriel Valley Planning Area has seen significant increases in racial/ethnic minority populations since 2010. In 2010, many block groups in the area had non-White populations of less than 60 percent. Currently, a majority of block groups in this region have racial/ethnic minority populations exceeding 80 percent.

Altadena (West San Gabriel Valley Planning Area)

Altadena was subdivided in the late 19th century and envisioned to become a rural suburb for millionaires north of Pasadena. The area known as "Altadena Meadows" was exempt from redlining and thrived to become one of first middle-class African American neighborhoods in the area. Altadena managed to maintain its unique rural character as well as the blending of residents from all income levels. In the 1960s, following lawsuits surrounding the desegregation of Pasadena public schools and displacement of African Americans by the routing of two major freeways in the area, and redevelopment in Pasadena, much of the white population in moved out of Altadena to newer suburbs. By 1975, half of the white population had left and were replaced by people of color. Today, approximately 25 percent of the population in Altadena is African American. In addition, in recent years, Altadena is experiencing somewhat of a different trend. Altadena has become a more affordable alternative to Pasadena. Many younger families of different races (Asian, Hispanic, and White) have moved into Altadena, purchasing and renovating older homes in the neighborhood.

Sun Village (Antelope Valley Planning Area)

Due to redlining restrictions in the City of Palmdale and neighboring communities, African Americans had few options to purchase land in the Antelope Valley. The community of Sun Village was established by an African American lawyer from Chicago, who purchased the land in 1939. Sun Village was reputed to be underdeveloped though there were services including a post office, businesses, and various civic organizations. The resiliency of Sun Village is a source of pride for its residents who are determined that the history of the community be included in any future narrative. Today, almost 60 percent of the population remains African American and the community operates its own chamber of commerce and town council. The centerpiece of the community is Jackie Robinson Park. It was developed by the County on land donated by the Sun Village Women's Club and was dedicated in-person by Jackie Robinson. Boosters raise funds throughout the year to support after-school programs including homework tutoring, sports, music, marching, and cheerleading.

Florence-Firestone (Metro Planning Area)

In the 19th century, the Southern Pacific Railroad and the Pacific Electric Red Cars had stops along Florence and Graham streets giving the area its name: Florence-Graham. In more recent years it was rebranded by the County to Florence-Firestone--a reference to its main east/west boulevards. Florence-Firestone was and remains today a common starting point for new arrivals to Los Angeles. Its proximity to downtown and jobs in the manufacturing core as well as public transit make it a convenient place to live. Beginning with European immigrants in the early 20th century and then African Americans relocating from the South for a better quality of life, by the late 20th century, immigrants from Central and South America began arriving. Today, 91 percent of residents in Florence-Firestone are of Hispanic origin and 87 percent are Spanish-speaking. Modest homes on small lots with an eclectic array of small businesses serve the local population.

Willowbrook (Metro Planning Area)

Just prior to the turn of the 20th century, the unincorporated community of Willowbrook grew up around a stop along the newly opened Pacific Red Car line. The first library in the Los Angeles County Public Library system was established in Willowbrook in 1903. The Pacific Electric Red Cars gave the subdivisions of large, rural lots efficient access to downtown Los Angeles and the ports at Long Beach. Following the ban on segregation and red lining in the late 40's, African Americans began moving into Willowbrook for the opportunity to keep livestock and the ability to grow large farm gardens. According to long-time residents, over the decades, cycles of promises made and not kept have resulted in displacement and caused a deep distrust in government and other outside forces. In recent years, Willowbrook has seen the start of a renaissance. Billions of dollars of public investment have resulted in massive public transportation infrastructure improvements, a new hospital and revitalized public health campus, and a new public library. There are also new green spaces including the County's first "green alley" and a beloved community vegetable garden with more in the works. Hundreds of housing units are being constructed and will be made available to existing residents in need of affordable housing. Sustained and continuing investments will be needed to fully regain the trust of local residents.

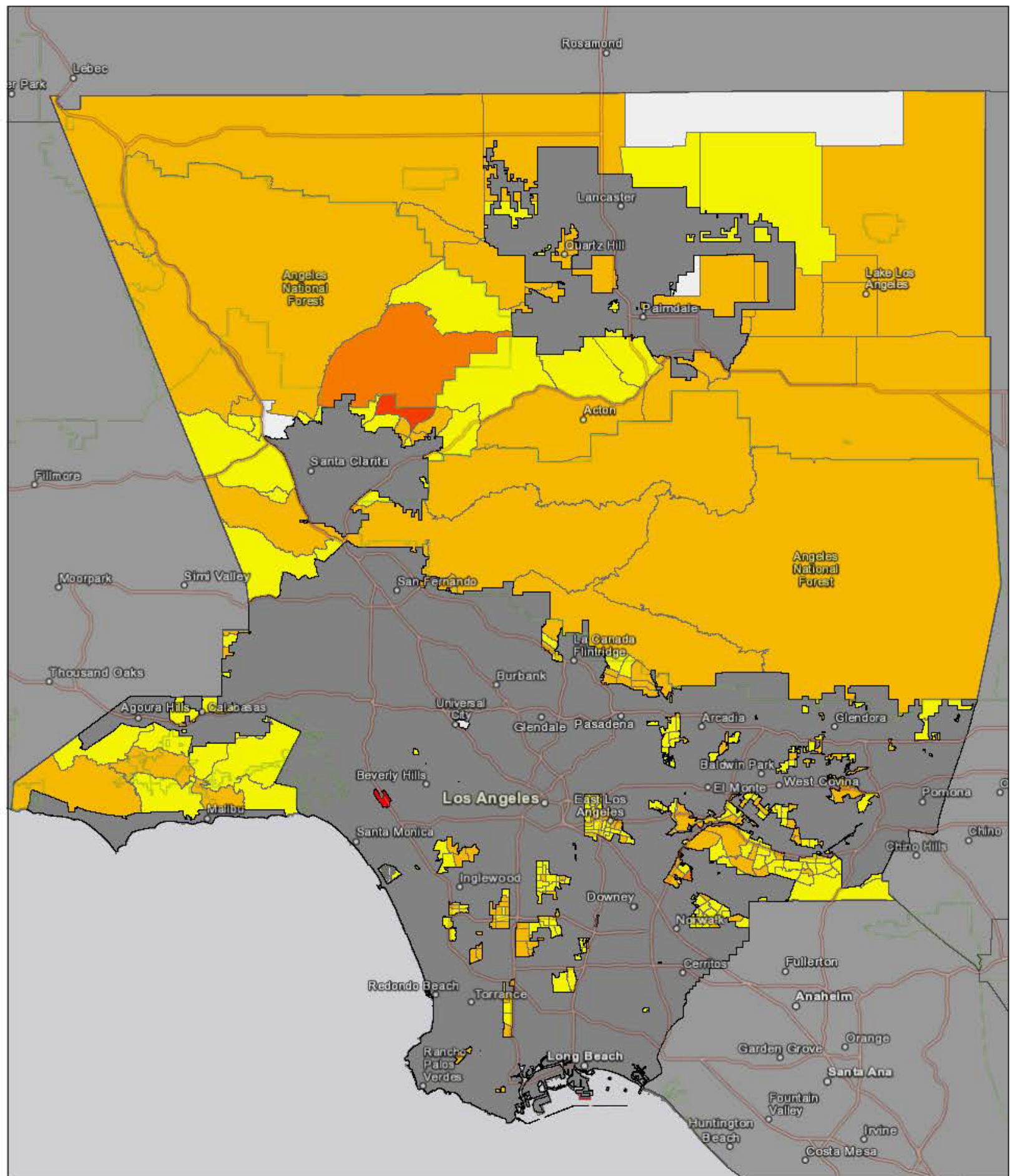
Disability

According to the 2014-2018 ACS, nearly 10 percent of Los Angeles County residents experience a disability. The 2018 AI included a survey in which over a third of respondents with a disability experienced difficulty getting around their neighborhood or housing complex, and approximately 10 percent of respondents indicated their homes had problems limiting accessibility. Discrimination complaints related to physical disability (47 percent) and mental disability (22 percent) were the most common.

Census tracts with a high number of persons with disabilities are generally not concentrated in specific areas of Los Angeles County. Unincorporated areas with larger populations of persons with disabilities are located in northeastern Santa Clarita Valley and West Los Angeles (Sawtelle VA)⁵. The percentage of persons with disabilities by census tract are shown in **Figure E-3: Population of Persons with Disabilities by Census Tract**.

⁵ The West Los Angeles (Sawtelle VA) unincorporated community, with the exception of one privately-owned parcel, is comprised of the United States Department of Veterans Affairs West Los Angeles campus, which provides services to veterans and is being further developed with permanent supportive housing under a master plan.

Figure E-3: Population of Persons with Disabilities by Census Tract



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 Incorporated City

 Surrounding Counties

 County Boundaries

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

 < 10%

10% - 20%

20% - 30%

30% - 40%

 > 40%

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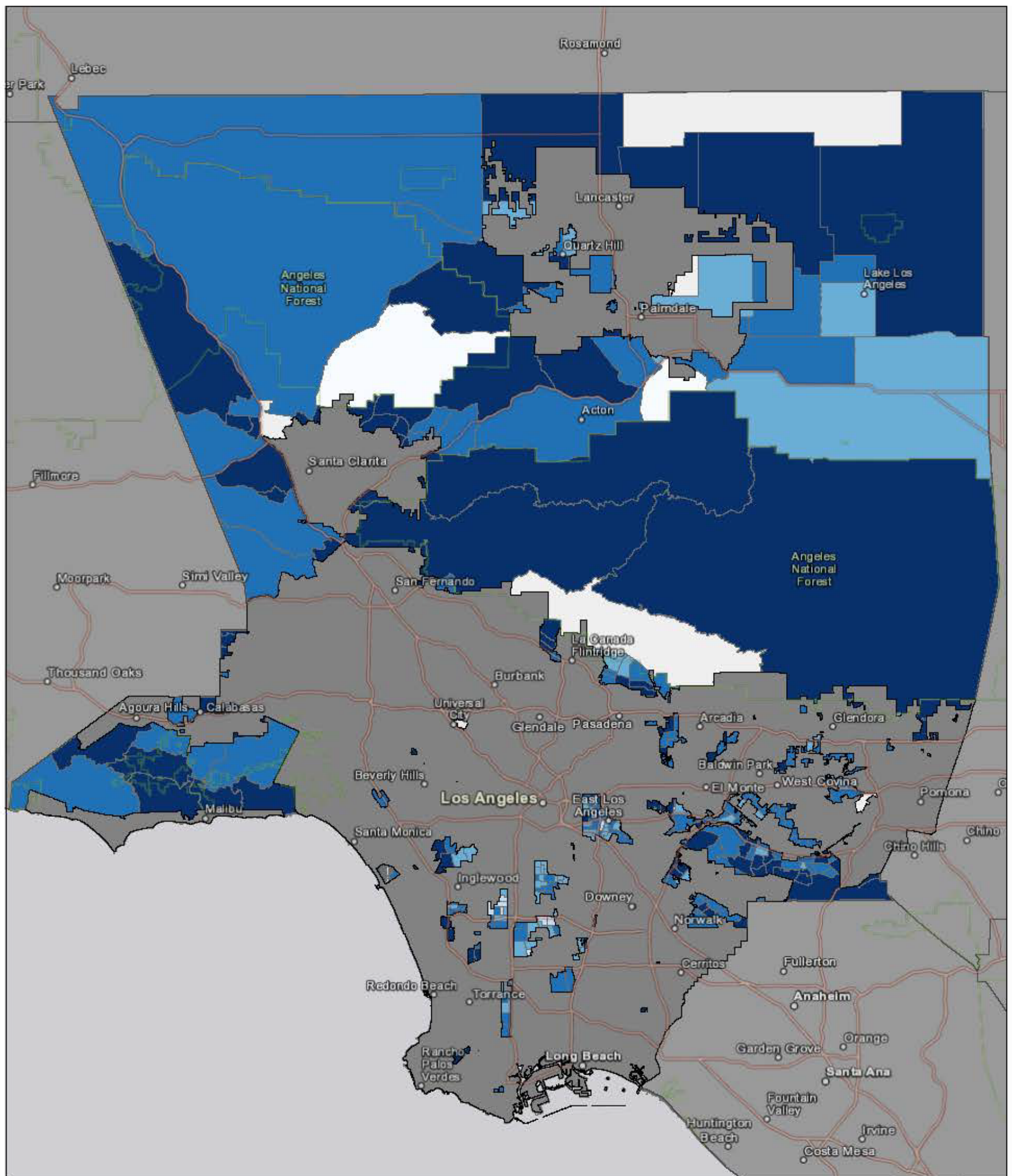
CA HCD

Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. 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 treatment, such as limiting the number of children in a complex or confining children to a specific location, is also a fair housing concern. Approximately 28.8 percent of households in Los Angeles County are families with children. As shown in **Figure E-4**, children in married couple families are concentrated in Ladera Heights-View Park, Del Aire, Alondra Park, and Westfield; communities in the eastern county including Whittier, La Habra Heights Island, and South Diamond Bar; the San Gabriel foothill communities; the Santa Clarita Valley and the Antelope Valley.

Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Children in female-headed households are most concentrated in some eastern Antelope Valley communities (**Figure E-5**).

Figure E-4: Children in Married Couple Households by Census Tract



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☐ Incorporated City

 Surrounding Counties

 County Boundaries

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

$$\square < 20\%$$

 20% - 40%

40% - 60%

60% - 80%

 > 80%

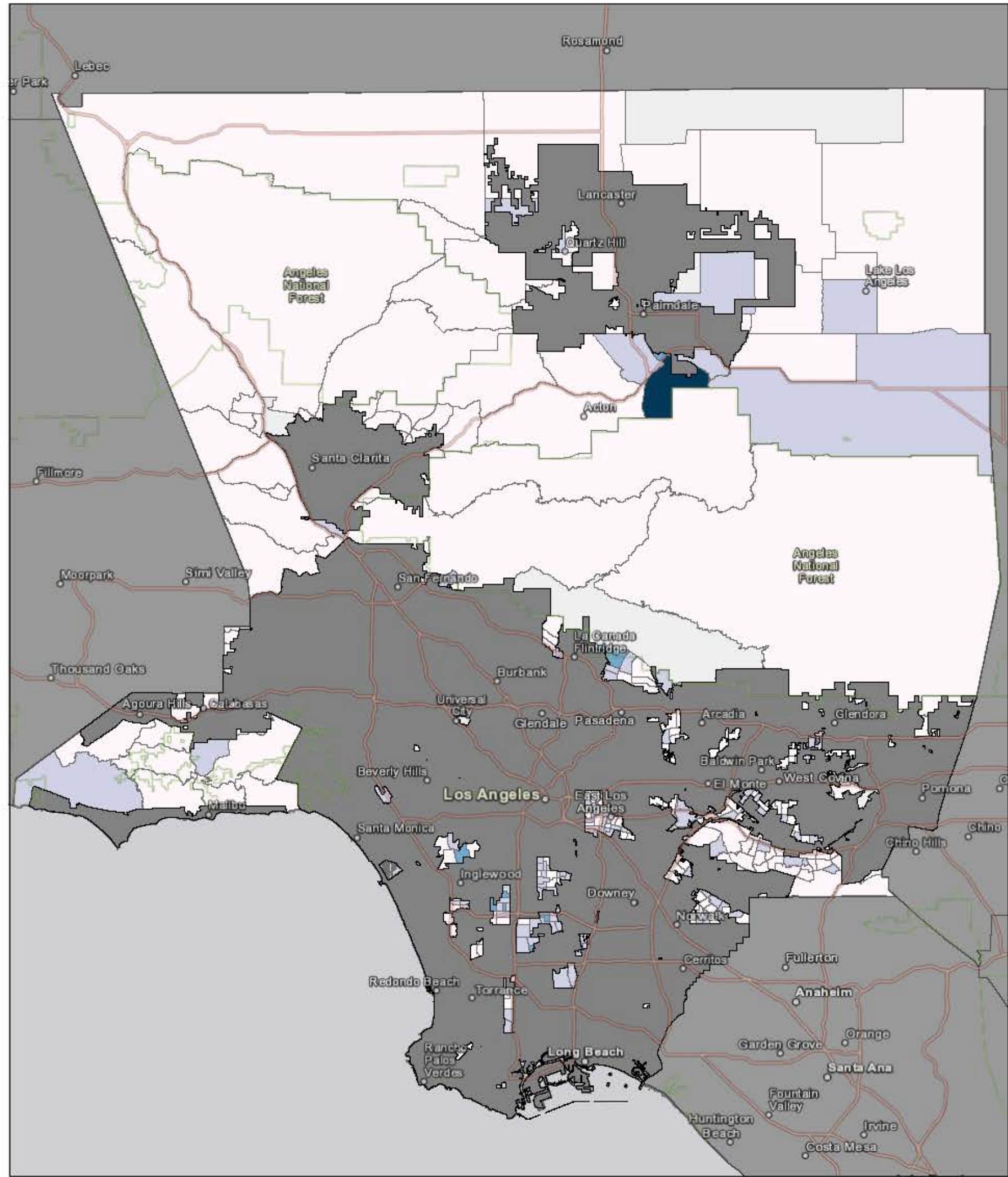
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Figure E-5: Children in Female-Headed Households by Census Tract

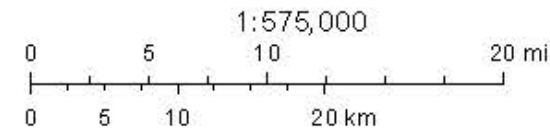


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- Incorporated City
- Surrounding Counties
- County Boundaries

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

- ≤ 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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Income

HUD’s 2010-2014 CHAS data shown in **Table E-3** shows that approximately 44 percent of Los Angeles Urban County households earn 80 percent or less than the County Area Median Income and are considered lower income. The median household income for the unincorporated areas is \$54,200 compared to \$61,015 countywide, according to the California Department of Finance.

Table E-3: Income Distribution – Los Angeles Urban County

Income Category	Households	Percent
<30% AMI	112,925	14.5%
31-50% AMI	99,257	12.8%
51-80% AMI	128,523	16.5%
81-100% AMI	72,758	9.4%
>100% AMI	363,881	46.8%
Total	777,344	100.0%

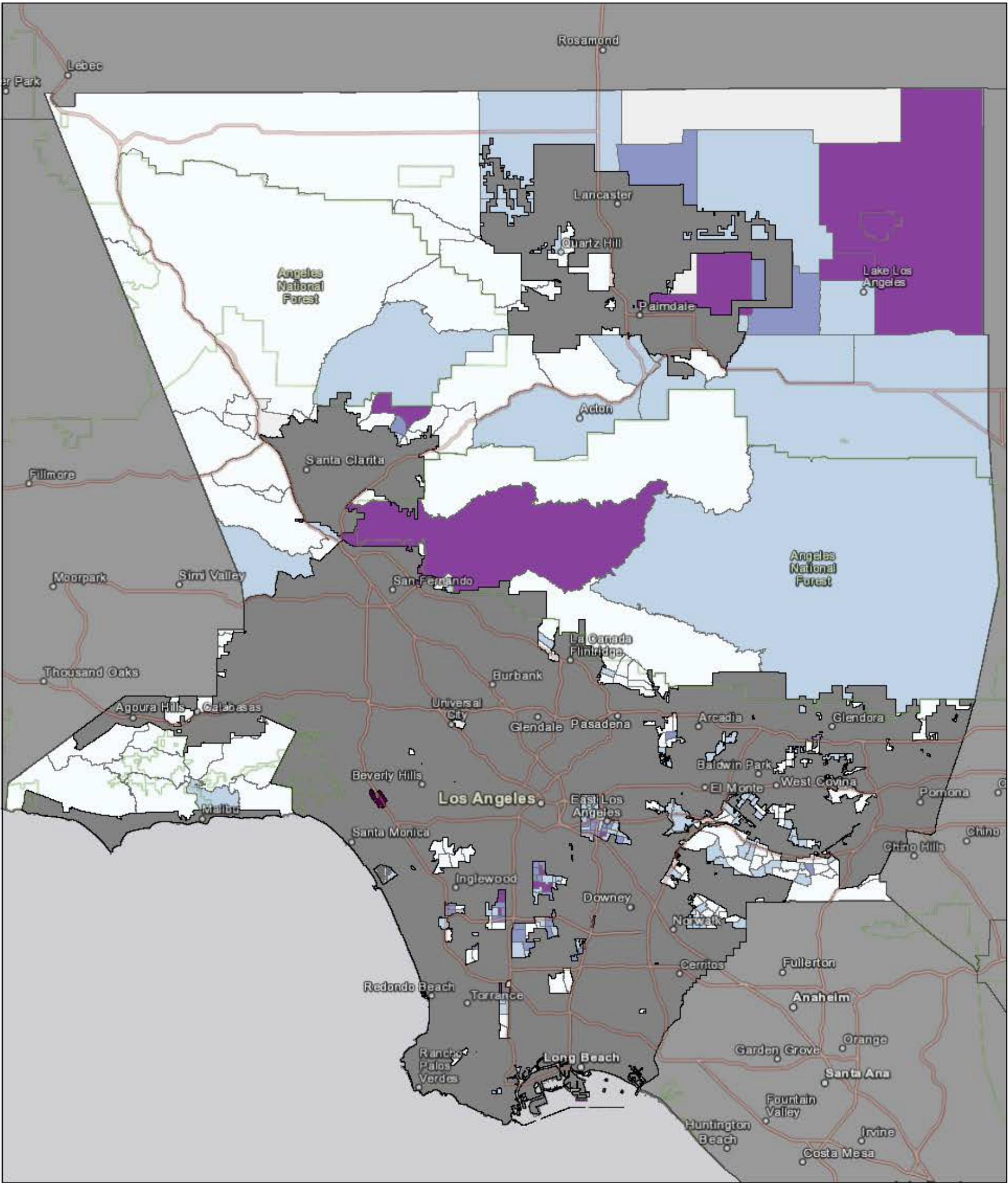
Source: LACDA 2018-2023 Consolidated Plan, HUD CHAS data (2010-2014 ACS).

Figure E-6 shows the percentage of persons below the federal poverty line by census tract. West Los Angeles (Sawtelle VA) has the highest population of residents below the federal poverty line (>40 percent) in the unincorporated areas. Approximately 30 to 40 percent of residents in Kagel/Lopez Canyons, northeastern Antelope Valley, West Athens-Westmont, Florence-Firestone, and Walnut Park are below the federal poverty level.

Figure E-7 shows the Lower and Moderate Income (LMI) areas in Los Angeles County by census tract. HUD defines a LMI area as a census tract or census block group where over 51 percent of the population belongs to the lower or moderate income categories. The following unincorporated areas have LMI populations that exceed 50 percent:

- West Los Angeles (Sawtelle VA)
 - Lennox
 - Del Aire
 - West Athens-Westmont
 - Florence-Firestone
 - Walnut Park
 - West Rancho Dominguez
 - Willowbrook
 - East Rancho Dominguez
- East Los Angeles
 - West Puente Valley
 - Valinda
 - South San Jose Hills
 - East Irwindale
 - Covina Islands
 - East Azuza
 - Some Antelope Valley communities
 - Some Santa Clarita Valley communities

Figure E-6: Poverty Status by Census Tract

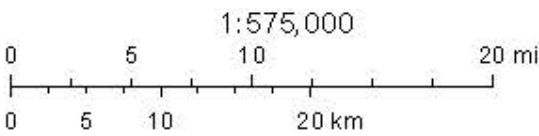


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- Incorporated City
- Surrounding Counties
- County Boundaries

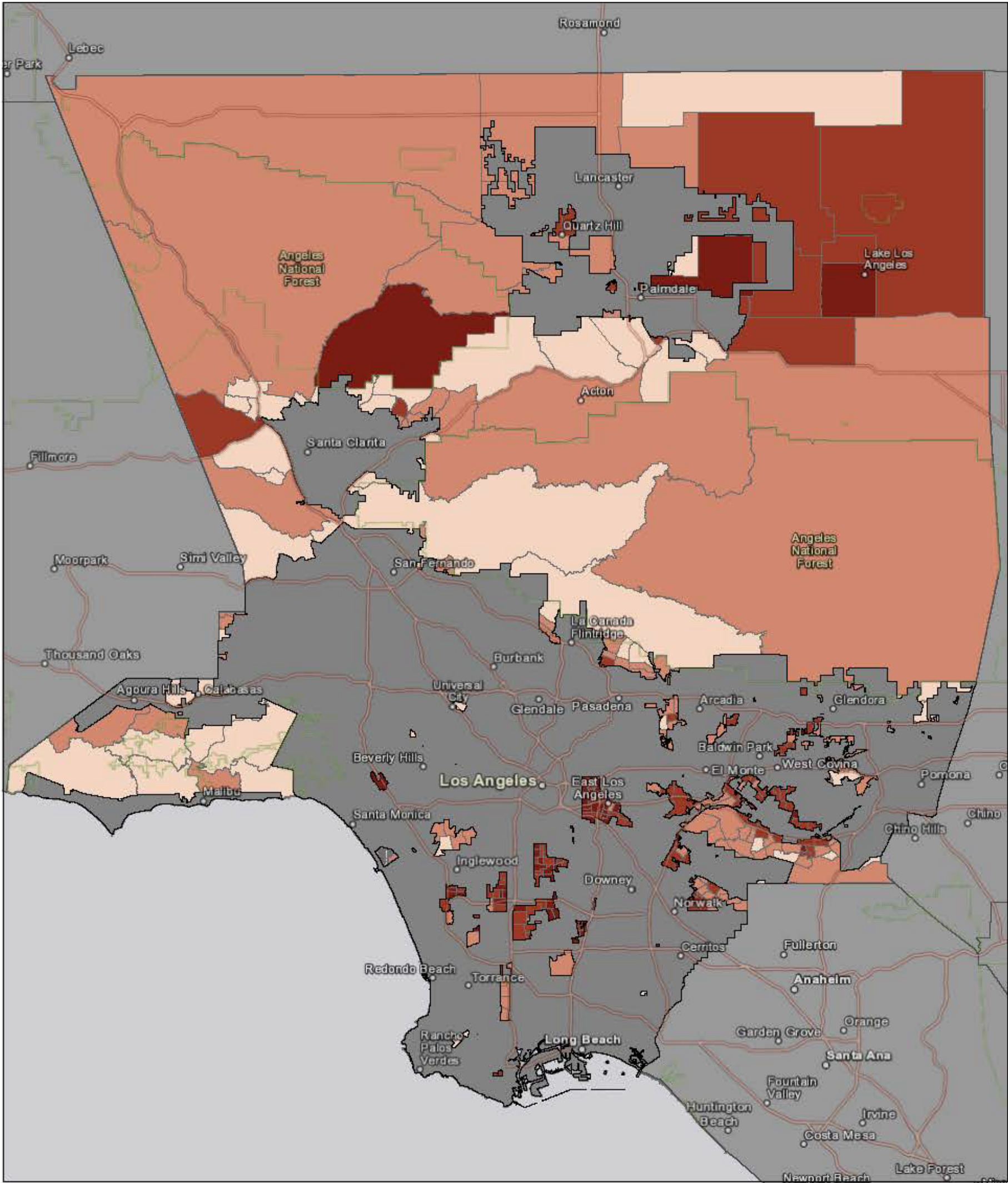
(R) Poverty Status (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%
- > 40%



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Figure E-7: Low and Moderate Income (LMI) Areas

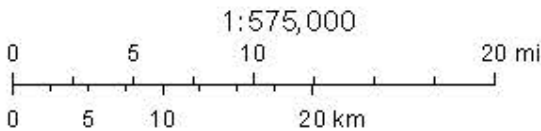


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- Incorporated City
- Surrounding Counties
- County Boundaries

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

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%



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Racially or Ethnically Concentrated Areas

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

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) with a poverty rate that exceeds 40 percent or is three times the average census tract poverty rate for the metro/micro area, whichever threshold is lower. There are five unincorporated areas with R/ECAP census tracts as shown in **Table E-4** and **Figure E-8**: West Athens-Westmont, Florence-Firestone, Lennox, West Los Angeles (Sawtelle VA), and Willowbrook. As presented in **Table E-5(A)**, the Hispanic/Latino population makes up the majority in the West Athens-Westmont, Florence-Firestone, Lennox, and Willowbrook R/ECAPs. In the West Los Angeles (Sawtelle VA) R/ECAP, 36.8 percent of the population is White, 26.5 percent of the population is Hispanic or Latino, and 22.4 percent of the population is Black or African American.

As shown in **Table E-5(B)**, In the West Athens-Westmont tract, the population of residents of a race not listed (“some other race”), Black or African American, and Hispanic or Latino populations experience poverty at the highest rates. In the Florence-Firestone tract, there are only two Asian residents, both of which are below the poverty level. The majority of American Indians and Whites in the Lennox R/ECAP are below the poverty level. The poverty rates for all racial/ethnic groups in tract 06037600100 (West Athens-Westmont) for which information was available have gone down since the 2008-2012 ACS. The Asian population in the Florence-Firestone R/ECAP, the White population in the Lennox R/ECAP, and the Asian population in the Willowbrook R/ECAP saw the highest increases in the poverty rate between 2012 and 2019. It is important to note that the Asian populations in the Florence-Firestone R/ECAP and Willowbrook R/ECAP are small. As stated previously, as of 2019, the Florence-Firestone tract has an Asian population of only two residents, and the Willowbrook tract has an Asian population of 257 residents representing approximately 3 percent of the total tract population.

Table E-4: R/ECAPs – Unincorporated Los Angeles County

Community Name	Census Tract Number
West Athens-Westmont	06037600100
	06037600303
Florence-Firestone	06037532800
Lennox	06037601700
West Los Angeles (Sawtelle VA)	06037701100
Willowbrook	06037541400

Source: Los Angeles County Analysis of Impediments to Fair Housing Choice, 2018; HUD R/ECAPs Database, March 2021.

Table E-5(A): Racial/Ethnic Composition of R/ECAPs

Race/Ethnicity	06037600100	06037600303	06037532800	06037601700	06037701100	06037541400
White alone	0.6%	1.9%	0.5%	0.2%	36.8%	0.8%
Black or African American alone	23.7%	33.4%	5.2%	7.9%	22.4%	8.4%
American Indian and Alaska Native alone	0.0%	0.0%	0.0%	0.0%	0.0%	2.8%
Asian alone	0.3%	0.1%	0.0%	1.7%	9.6%	3.2%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Some other race alone	0.5%	0.0%	0.0%	3.2%	0.0%	0.0%
Two or more races	0.0%	0.7%	0.0%	0.0%	4.6%	0.1%
Hispanic or Latino	74.9%	64.0%	94.2%	87.0%	26.5%	84.7%
Total	7,410	3,883	4,590	5,126	1,101	7,989

Source: 2015-2019 ACS (5-Year Estimates).

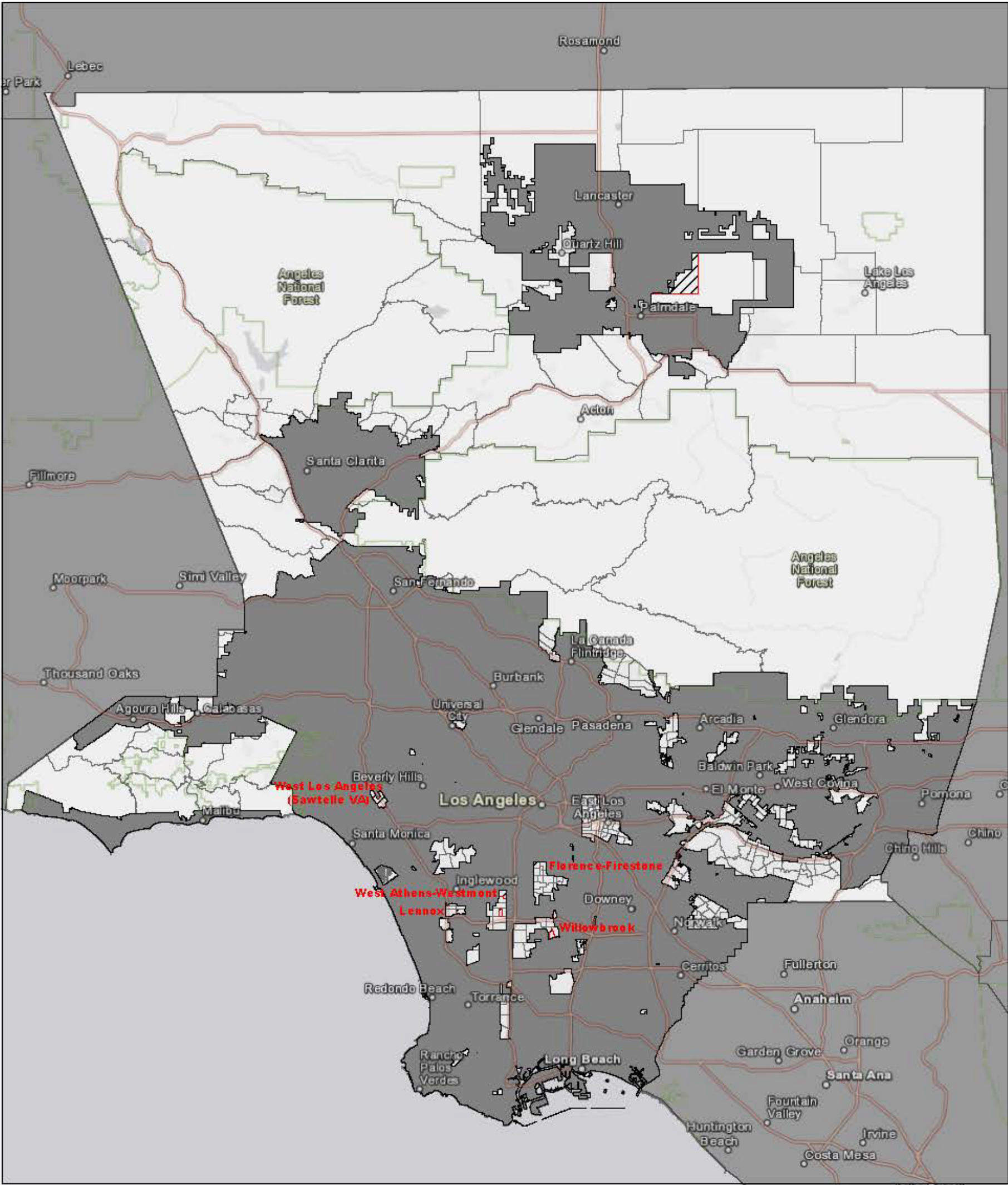
Table E-5(B): Poverty Status by Race for R/ECAPs

Race/Ethnicity	Percent Below Poverty Level					
	06037600100	06037600303	06037532800	06037601700	06037701100	06037541400
2015-2019 ACS						
Black or African American alone	34.3%	40.0%	22.0%	38.3%	53.0%	48.5%
American Indian and Alaska Native alone	0.0%	0.0%	-	85.7%	0.0%	0.0%
Asian alone	0.0%	0.0%	100.0%	1.2%	76.9%	42.0%
Native Hawaiian and Other Pacific Islander alone	-	-	-	-	-	-
Some other race alone	38.7%	39.6%	33.6%	8.8%	100.0%	24.9%
Two or more races	29.0%	1.0%	-	0.0%	83.9%	0.0%
Hispanic or Latino origin (of any race)	31.0%	29.4%	27.6%	14.0%	69.5%	25.7%
White alone, not Hispanic or Latino	6.8%	1.4%	20.0%	72.7%	60.1%	29.5%
2008-2012 ACS						
Black or African American alone	35.8%	46.3%	62.9%	30.5%	71.5%	31.3%
American Indian and Alaska Native alone	0.0%	-	-	100.0%	-	50.0%
Asian alone	-	0.0%	0.0%	100.0%	50.0%	0.0%
Native Hawaiian and Other Pacific Islander alone	100.0%	-	-	-	-	-

Some other race alone	55.7%	60.6%	16.1%	46.7%	75.0%	28.5%
Two or more races	46.5%	0.0%	63.6%	50.0%	44.4%	100.0%
Hispanic or Latino origin (of any race)	46.8%	50.3%	38.3%	39.7%	84.0%	45.8%
White alone, not Hispanic or Latino	8.3%	21.1%	0.0%	19.3%	57.0%	42.4%

Source: 2008-2012 and 2015-2019 ACS (5-Year Estimates).

Figure E-8: Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)

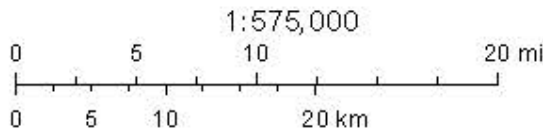


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- Incorporated City
- Surrounding Counties
- County Boundaries

(R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAP'S" (HUD, 2009 - 2013) - Tract

- 0 - Not a R/ECAP
- 1 - R/ECAP



Racially or Ethnically Concentrated Areas of Affluence

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed. A HUD Policy Paper defines racially concentrated areas of affluence as affluent, White communities.⁶ According to this report, 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.” Based on their research, RCAs are defined as census tracts where 1) 80 percent or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016).

Table E-6 shows the median household income by race or ethnicity in Los Angeles County using 2015-2019 and 2006-2010 and 2015-2019 ACS estimates. The median household income in Los Angeles County is \$68,044, an increase of 22.7 percent since 2010. Non-Hispanic White, Asian, Native Hawaiian and other Pacific Islander, and two or more race households all have median incomes exceeding the countywide average. Conversely, Black, American Indian and Alaska Native, and Hispanic households and households of a race not listed (“some other race”) have median incomes lower than \$68,044. Since the 2006-2010 ACS, households of two or more races have seen the most significant increase in median income (+31.8 percent), while the median income for Black or African American households increased only 16 percent.

Table E-6: Median Household Income by Race/Ethnicity

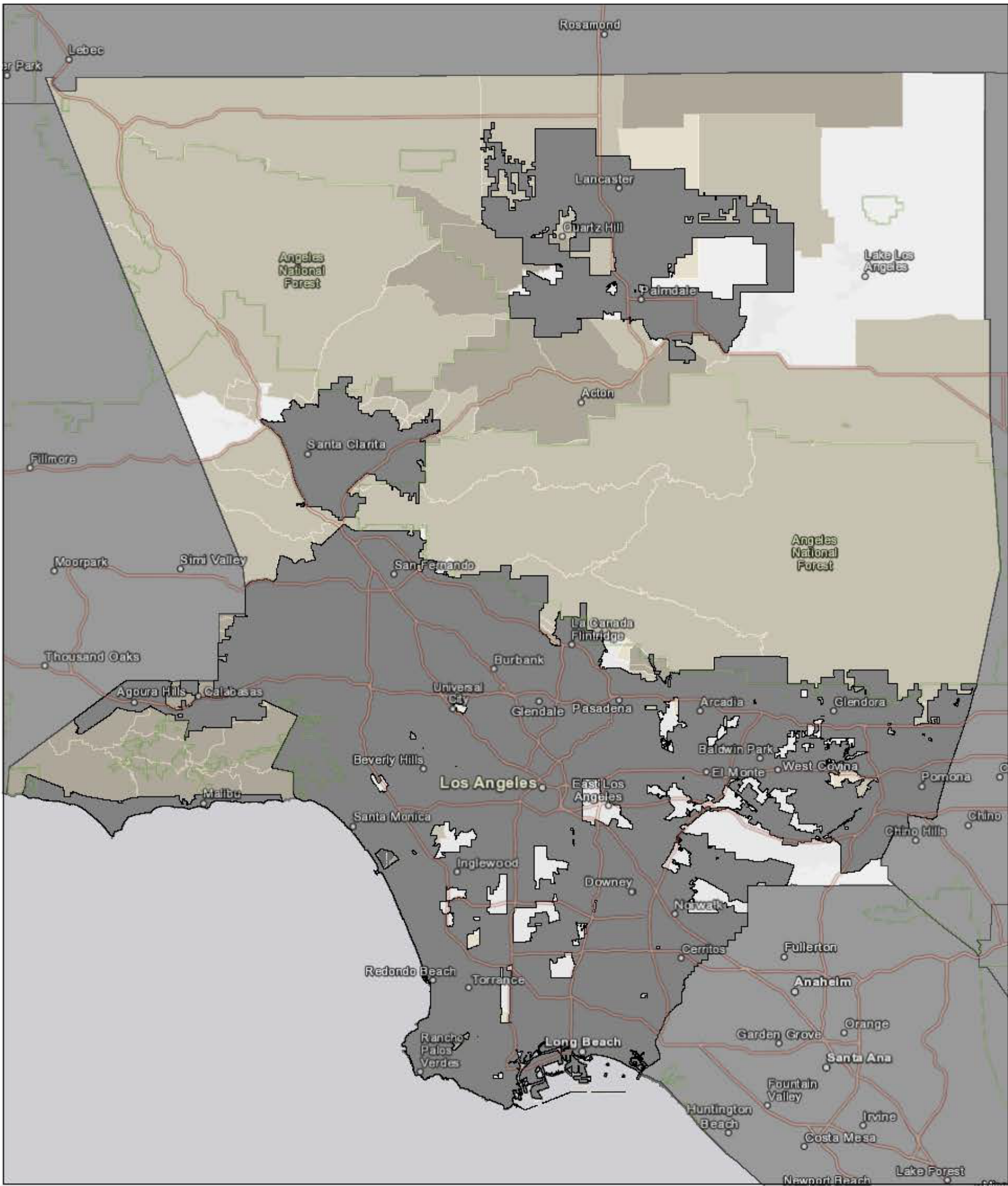
	Median Household Income (2019)	Median Household Income (2010)	Percent Change (2010-2019)
White	\$75,422	\$61,839	22.0%
Black or African American	\$48,823	\$42,071	16.0%
American Indian and Alaska Native	\$58,970	\$47,396	24.4%
Asian	\$80,046	\$64,367	24.4%
Native Hawaiian and Other Pacific Islander	\$71,502	\$60,367	18.4%
Some other race	\$53,331	\$43,346	23.0%
Two or more races	\$73,880	\$56,047	31.8%
Hispanic or Latino origin (of any race)	\$56,076	\$44,989	24.6%
White alone, not Hispanic or Latino	\$88,038	\$71,768	22.7%
All Households	\$68,044	\$55,476	22.7%

Source: 2006-2010 and 2015-2019 ACS (5-Year Estimates).

Figure E-9 shows census tracts with predominantly White populations and **Figure E-10** shows median income by census block group. The Santa Monica Mountains North Area and Coastal Zone, Altadena, some communities in northeastern Santa Clarita Valley, and some communities in southwestern Antelope Valley have both predominantly White populations and median incomes exceeding \$125,000.

⁶ Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.’ Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-124).

Figure E-9: Predominantly White Populations



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- Incorporated City
- Surrounding Counties
- County Boundaries
- (R) Predominant Population - White Majority Tracts
 - Slim (gap < 10%)
 - Sizeable (gap 10% - 50%)
 - Predominant (gap > 50%)

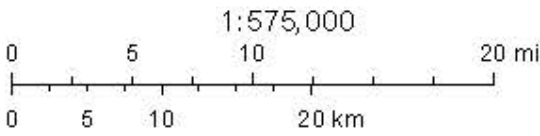
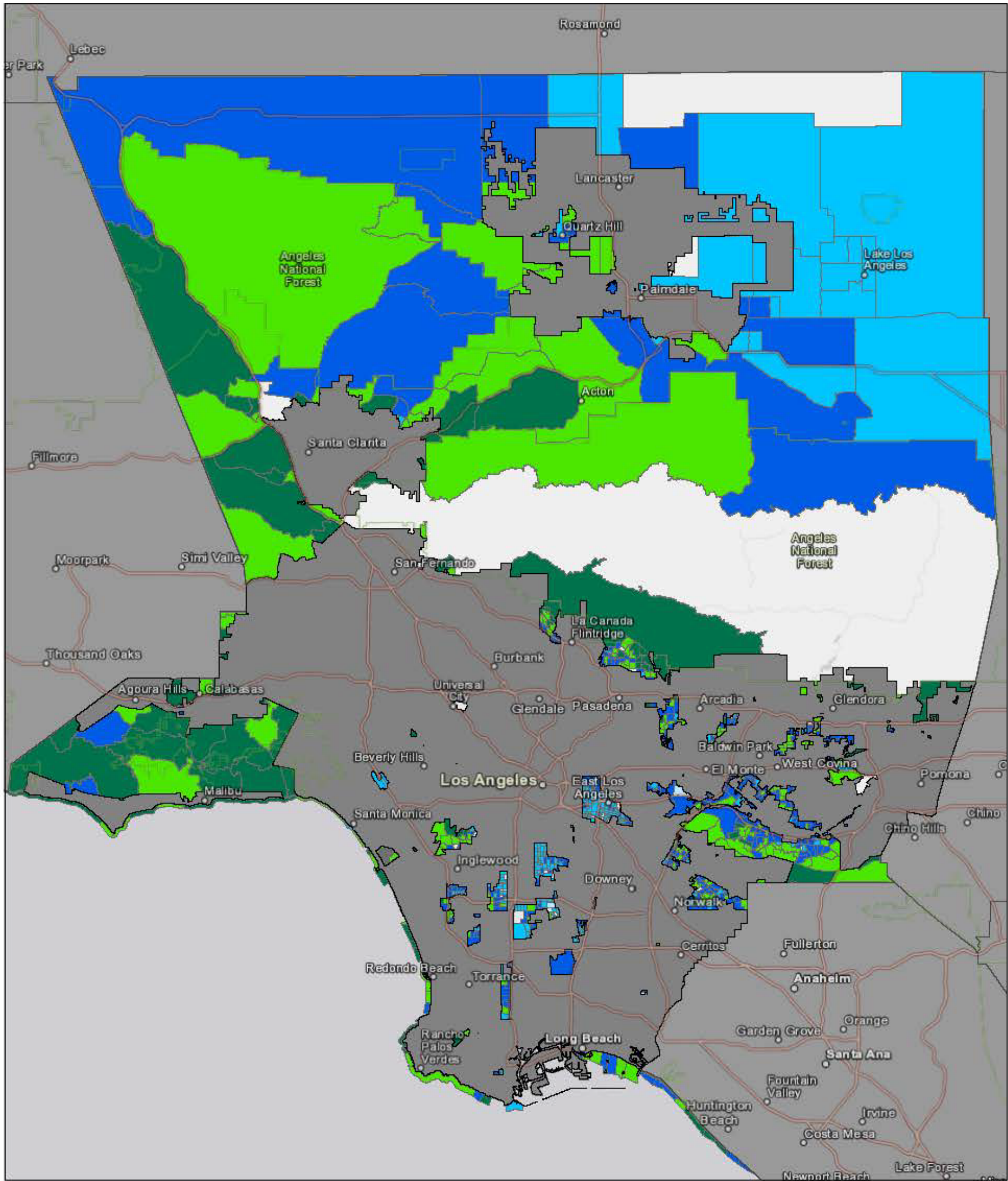


Figure E-10: Median Income by Block Group

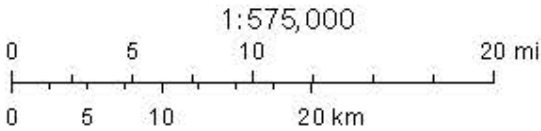


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- Incorporated City
- Surrounding Counties
- County Boundaries

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

- < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000



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Access to Opportunities

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing 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 created Opportunity Maps to identify resource 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 percent Low Income Housing Tax Credits (LIHTCs).” These maps show composite scores of three domains made up of a set of indicators, as shown in **Table E-7**.

Table E-7: Domains and List of Indicators for Opportunity Maps

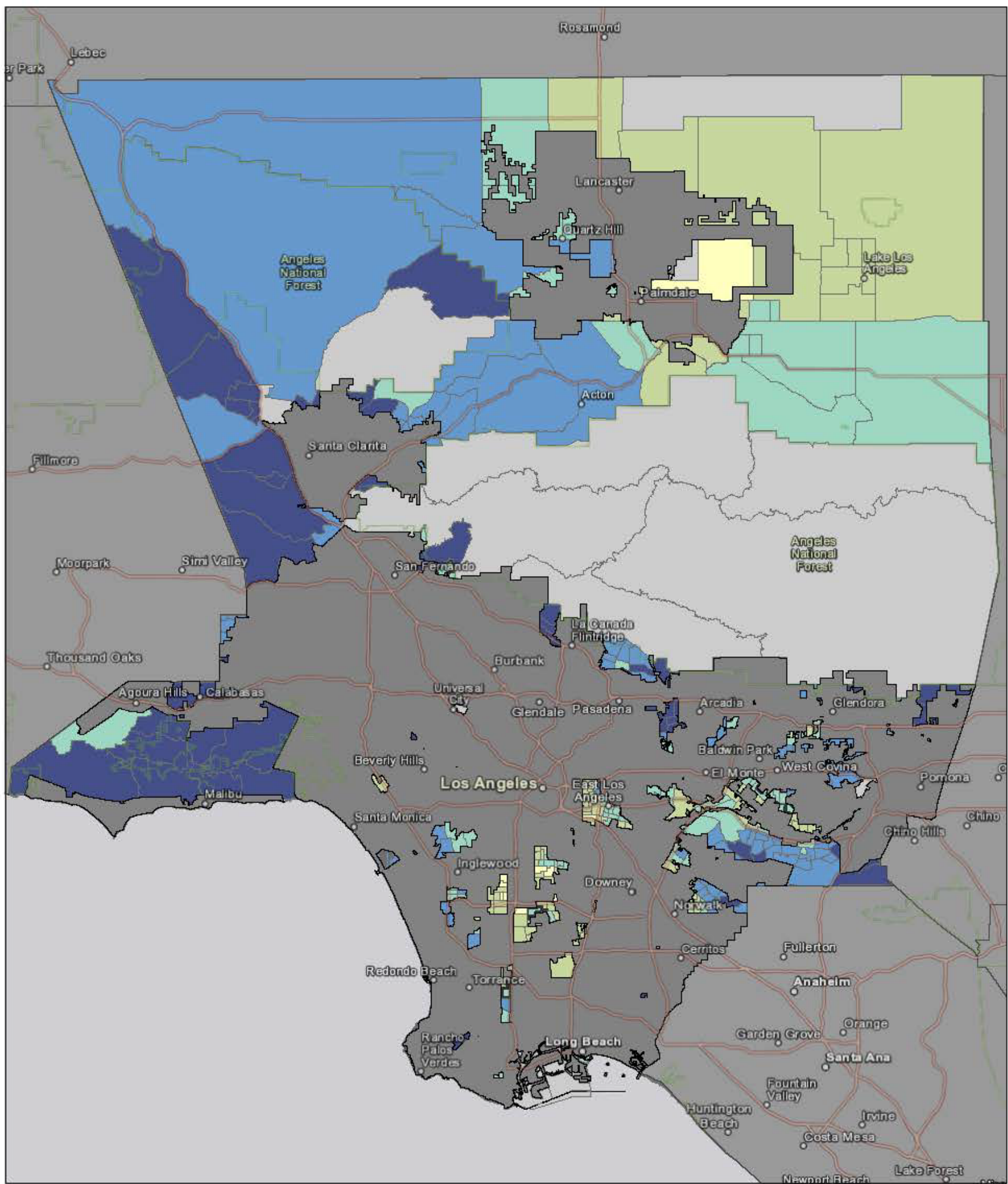
Economic	Poverty Adult education Employment Job proximity Median home value
Education	Math proficiency Reading proficiency High school graduation rates Student poverty rates
Poverty and Racial Segregation	Poverty: Census tracts with at least 30 percent of population under federal poverty line Racial segregation: Census 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 the 2021 TCAC/HCD Opportunity Maps, December 2020.

Based on the aforementioned composite score, census tracts are categorized as Highest Resource, High Resource, Moderate Resource (Rapidly Changing), Moderate Resource, Low Resource, or areas of High Segregation and Poverty. **Figure E-11** shows the composite scores for Los Angeles County census tracts and **Figure E-12** shows areas of high segregation and poverty alone. Unincorporated areas along the western County boundary and along the southern border of the Angeles National Forest are primarily High and Highest Resource areas. East Los Angeles, West Athens-Westmont, Willowbrook, West Rancho Dominguez, Rancho Dominguez, East Rancho Dominguez, Hawthorne Island, La Rambla, Florence-Firestone, South San Gabriel, Avocado Heights, West Puente Valley, Valinda, South San Jose Hills, Covina Islands and eastern communities in the Antelope Valley are designated as Moderate or Low Resource. West Athens-Westmont, Willowbrook, West Rancho Dominguez, Walnut Park, Florence-Firestone, East Los Angeles, and some eastern communities in the Antelope Valley encompass one or more High Segregation and Poverty census tracts.

The following analysis breaks down TCAC domain scores by census tract. Of the five unincorporated areas with R/ECAP census tracts, all have lower economic scores, three have lower education scores, and four have lower environmental scores. These areas also have higher concentrations of people of color, persons with disabilities, children in female-headed households, or LMI populations.

Figure E-11: TCAC Opportunity Scores by Census Tract

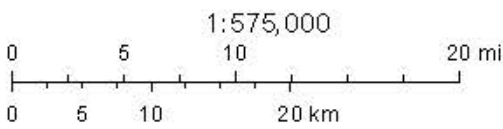


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- Incorporated City
- Surrounding Counties
- County Boundaries

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

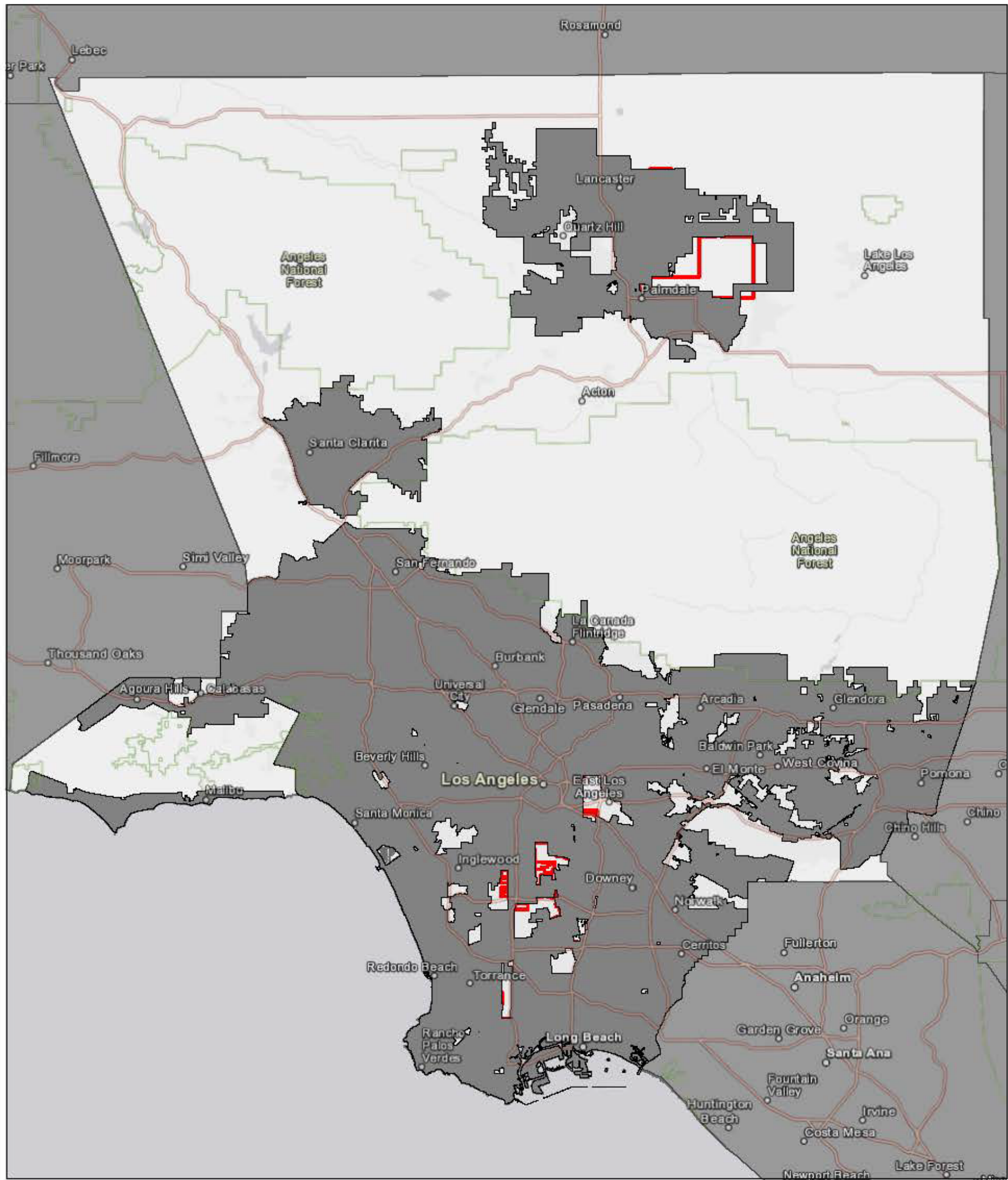
- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data




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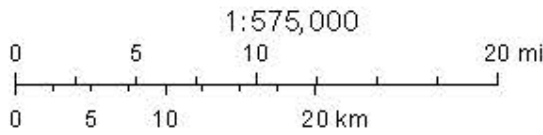
CA HCD

Figure E-12: TCAC Opportunity Scores – High Segregation and Poverty



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-  Incorporated City
-  Surrounding Counties
-  County Boundaries
-  (R) TCAC Area of High Segregation and Poverty (2021) - Tract



Economic Opportunity

As discussed in **Table E-7**, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 Task Force maps presented in **Figure E-13**, there are multiple unincorporated areas with very low economic score (<0.25). Several of these communities, including West Los Angeles (Sawtelle VA), Lennox, Florence-Firestone, West Athens-Westmont, East Los Angeles, and some communities in eastern Antelope Valley, are also areas with larger populations of people of color, persons with disabilities, children in female-headed households, or LMI populations (see **Figure E-1** through **Figure E-7**).

Educational Opportunity

The Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates (**Table E-7**). Areas with lower education scores, shown in **Figure E-14**, are generally concentrated in View Park-Windsor Hills, East Los Angeles, West Athens-Westmont, Willowbrook, West Rancho Dominguez, La Rambla, Florence-Firestone, Covina Islands, South San Jose Hills, Walnut Islands, some communities in northern Santa Clarita Valley, some communities in eastern Antelope Valley and parts of the western Santa Monica Mountains.

Environmental Health

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. **Figure E-15** shows environmental health scores by census tract for Los Angeles County. Several of the tracts with lower economic and education scores also score lower in environmental health. West Los Angeles (Sawtelle VA), Florence-Firestone, West Carson, Rancho Dominguez, East Los Angeles, Willowbrook, West Rancho Dominguez, South San Gabriel, Avocado Heights, North Whittier, Hacienda Heights, West San Dimas, Walnut Islands, West Puente Valley, and some communities in northern Santa Clarita Valley all scored the lowest in environmental health. As discussed in the *Economic and Employment Opportunities* section of this analysis, several of these census tracts also have higher concentrations of people of color, persons with disabilities, children in female-headed households, and LMI populations.

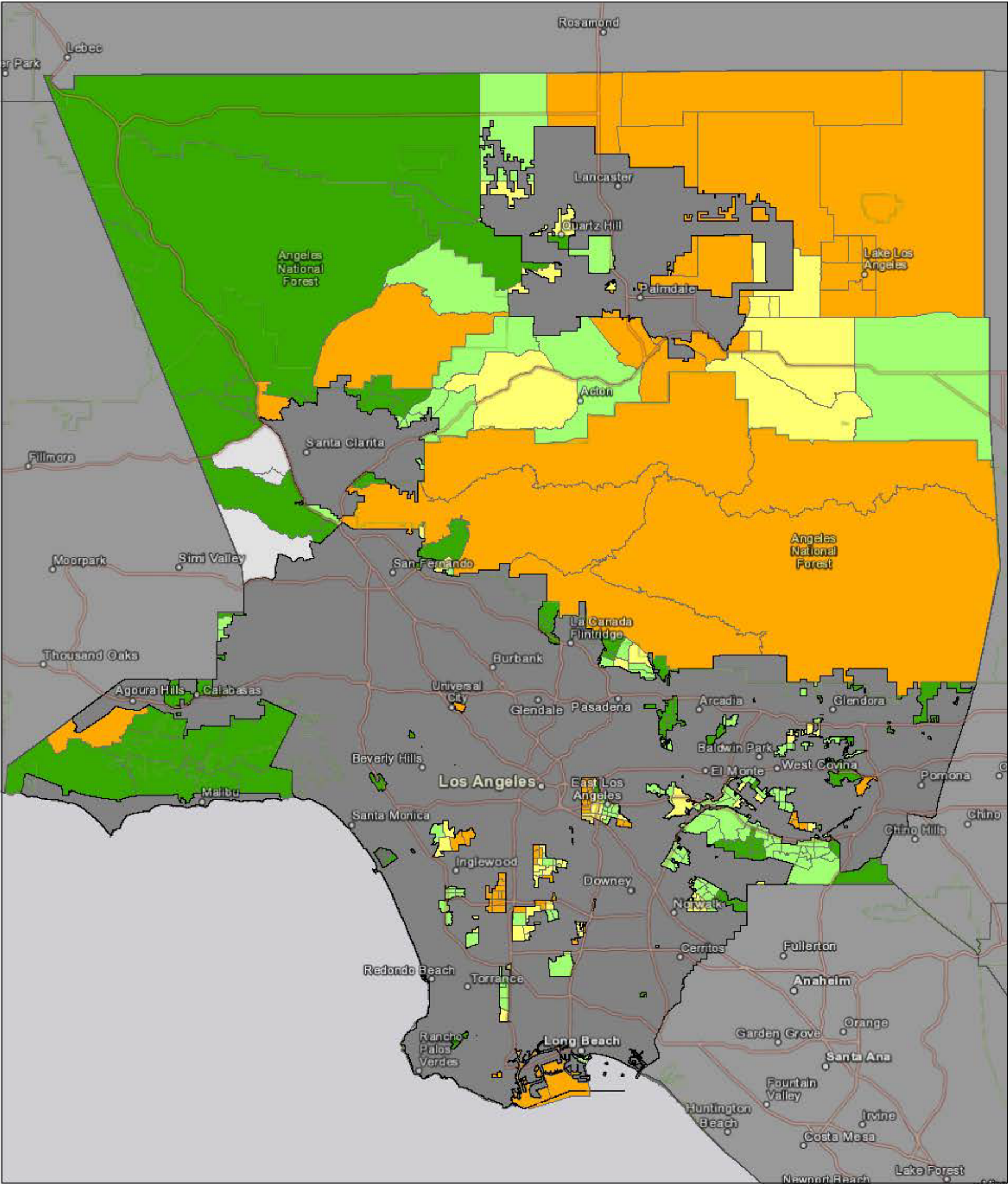
Transportation

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities.⁷ As part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG developed a mapping tool for High Quality Transit Areas (HQTAs). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor.⁸ Several areas in Los Angeles County, including unincorporated areas, include HQTAs. However, there are no HQTAs in the unincorporated areas in the northern, western, and eastern sections of Los Angeles County (**Figure E-16**).

Transportation need can be measured using HUD’s jobs proximity index. The job proximity index measures accessibility to jobs based on the location of residential developments and employment centers. West Athens-Westmont, Willowbrook, La Rambla, Florence-Firestone, East Rancho Dominguez, Cerritos Islands, Valinda, Covina Islands and northeastern Antelope Valley communities also have the lowest job proximity indices (**Figure E-17**). Portions of South Whittier-Sunshine Acres, West Puente Valley, East Irwindale, and Charter Oak; and Covina Islands, Valinda, and northern Santa Clarita Valley are also the farthest from employment opportunities.

⁷ TransForm. 2019. Pricing Roads, Advancing Equity: A Report and Toolkit to Help Communities Advance a More Equitable and Affordable Transportation System.
⁸ Major transit stop: A site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code Section 21064.3). It also includes major transit stops that are included in the applicable regional transportation.
High-quality transit corridor: A corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Figure E-14: TCAC Education Opportunity Scores by Census Tract

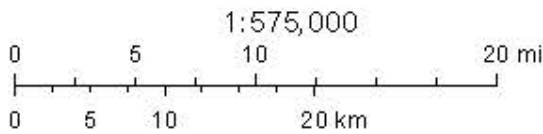


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- Incorporated City
- Surrounding Counties
- County Boundaries

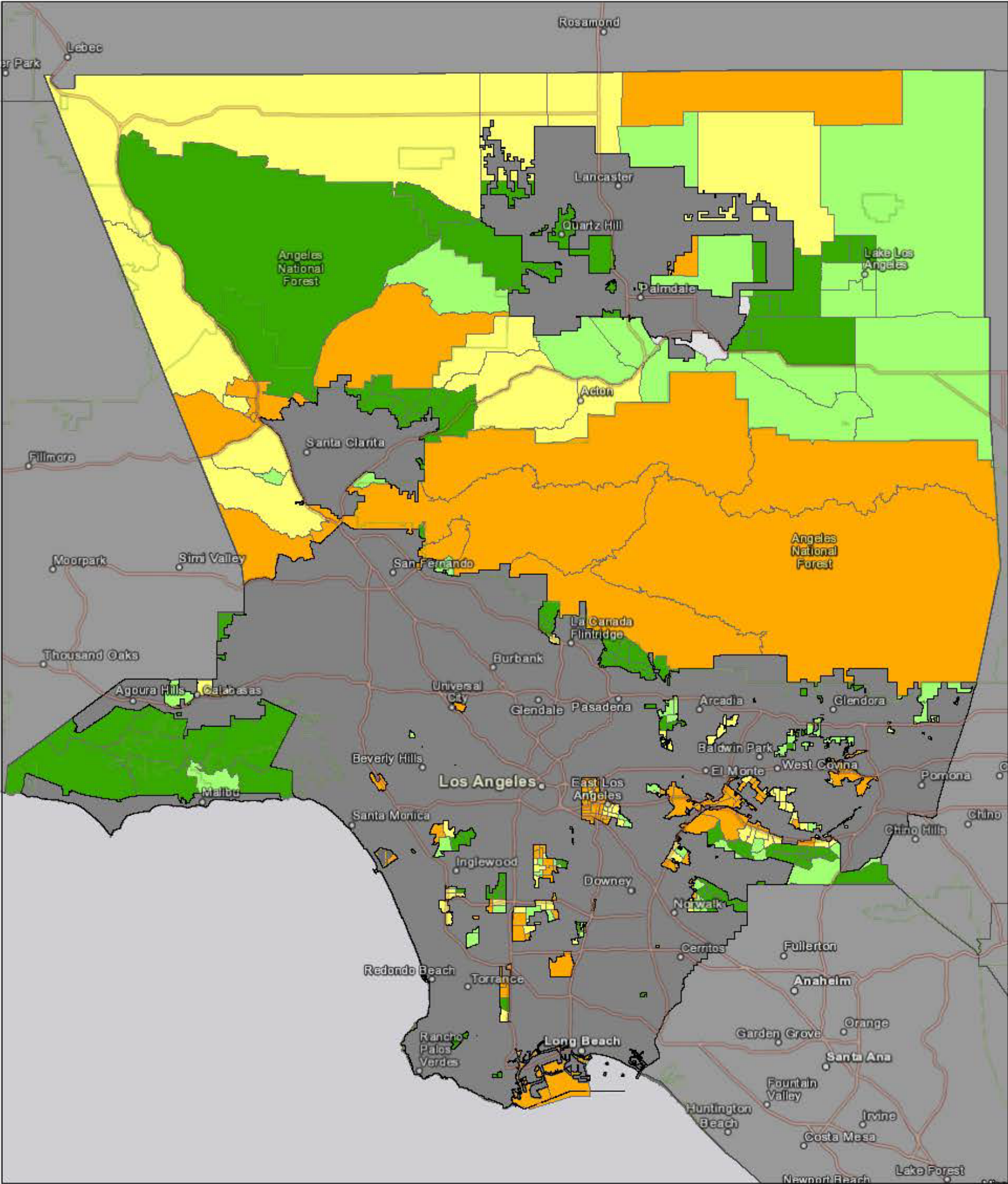
(R) TCAC Opportunity Areas (2021) - Education Score -Tract

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



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Figure E-15: TCAC Environmental Opportunity Scores by Census Tract

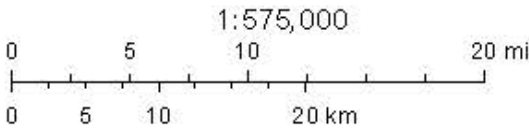


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- Incorporated City
- Surrounding Counties
- County Boundaries

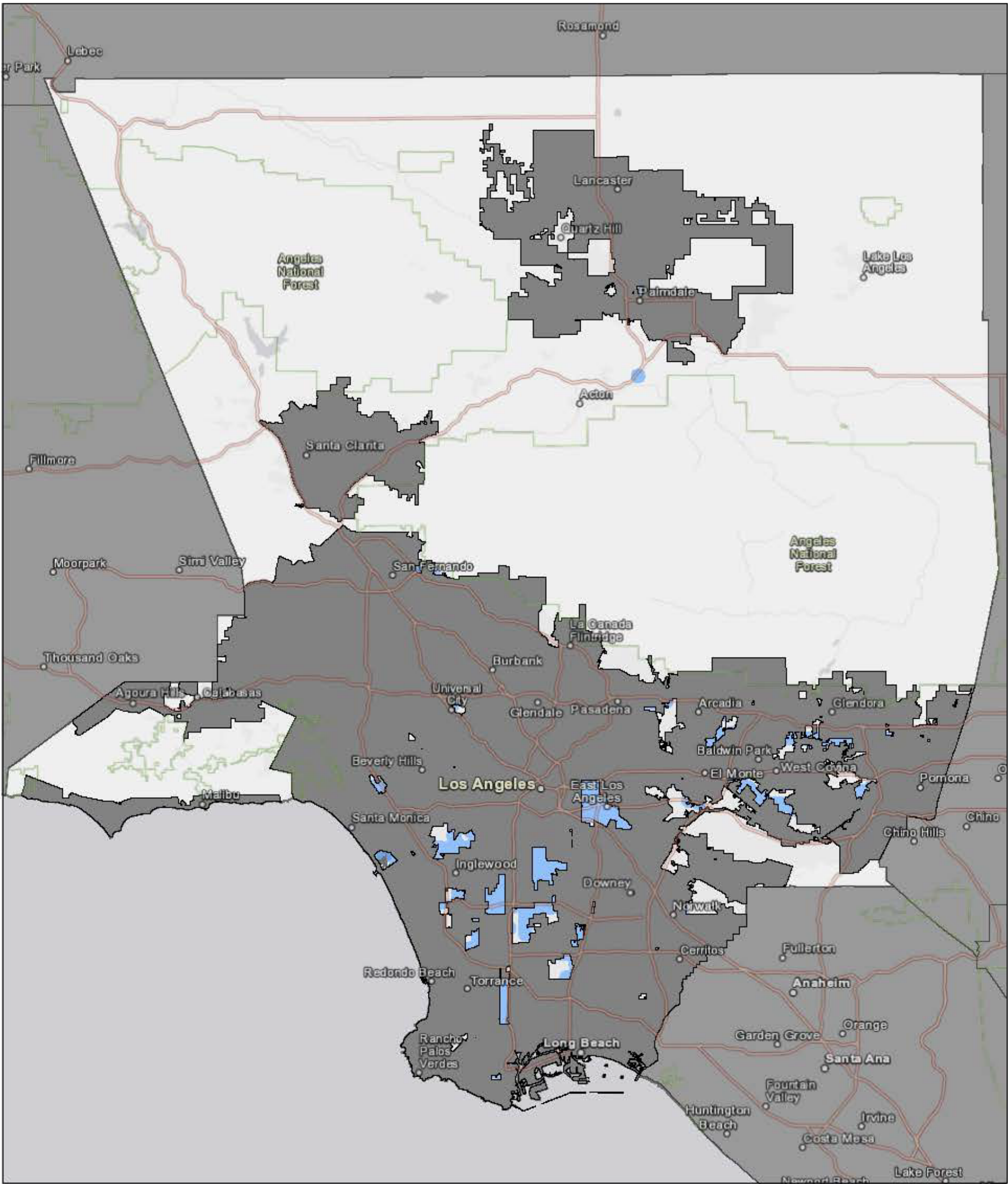
(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

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



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Figure E-16: High Quality Transit Areas (HQTAs)



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- Incorporated City
- Surrounding Counties
- High Quality Transit Areas (HQTA) 2045 – SCAG Region - High Quality Transit Areas (2045)
- County Boundaries

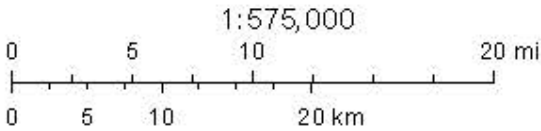
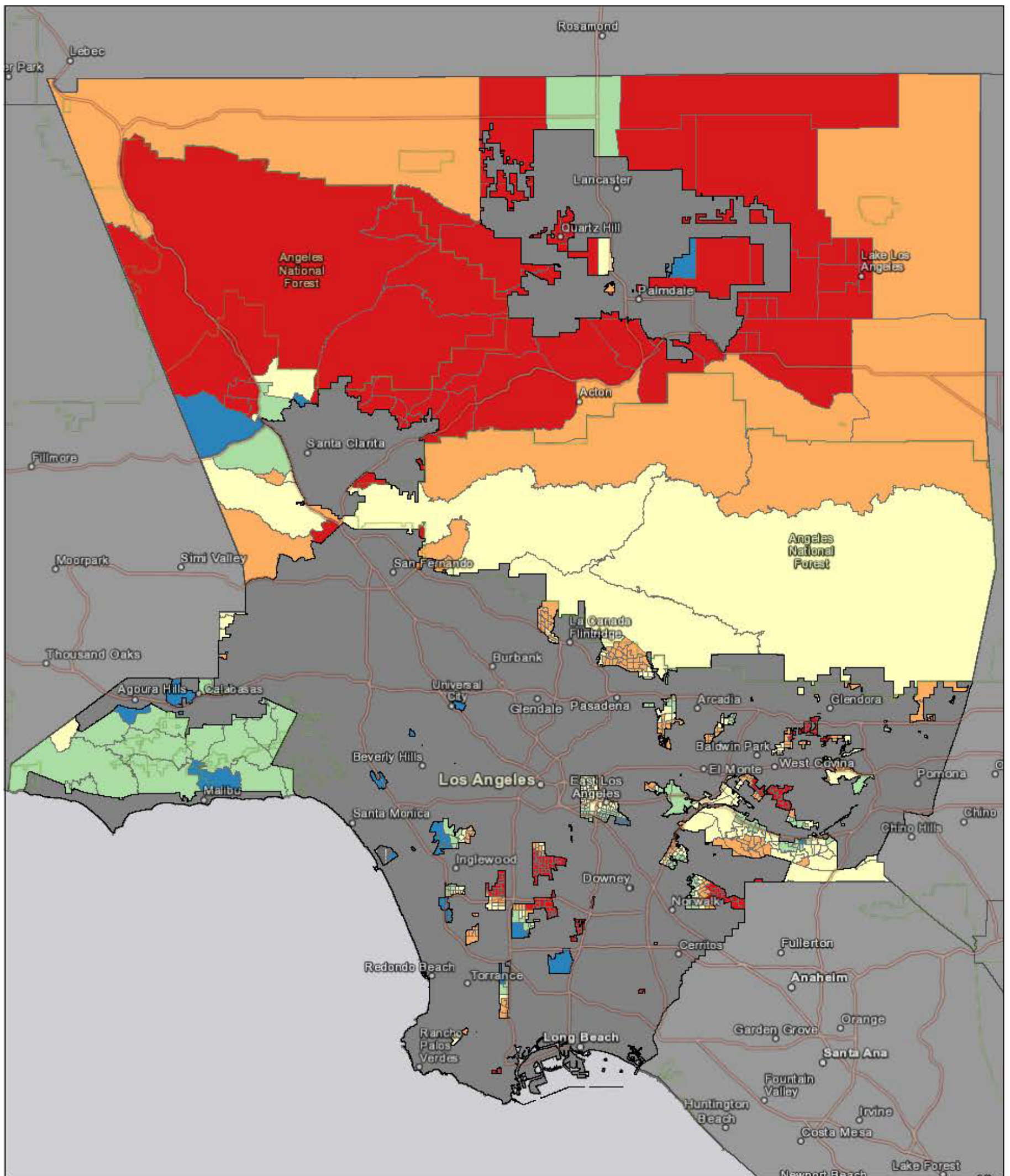



Figure E-17: Jobs Proximity Index by Block Group



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 Incorporated City

 Surrounding Counties

 County Boundaries

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

 < 20 (Furthest Proximity)

 20 - 40

40 - 60

60 - 80

 > 80 (Closest Proximity)

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Disproportionate Housing Needs

Cost Burden

Housing problems for Los Angeles Urban County jurisdictions were analyzed in LACDA’s 2018-2023 Consolidated Plan based on 2010-2014 HUD CHAS data. **Table E-8** shows the housing problems for the Los Angeles Urban County, including cost burden, by race and ethnicity. The following conditions are considered housing problems:

- Substandard Housing (incomplete plumbing or kitchen facilities)
- Overcrowding (more than 1 person per room)
- Cost burden (housing costs greater than 30 percent)

Housing problems were most common in Hispanic (60.5 percent) and Pacific Islander (54.3 percent) households. White non-Hispanic households had the lowest proportion of households with housing problems. Cost burden was most common among Black households (49.7 percent) and Hispanic households (49.7 percent). In comparison, only 48.2 percent of all households experienced a housing problem and 42.9 percent of all households spent more than 30 percent of their income on housing.

Table E-8: Housing Problems by Race and Ethnicity – Los Angeles Urban County

Race or Ethnicity	Cost Burden		With 1 or More Housing Problem		Total Households
	Total	Percent	Total	Percent	
White, non-Hispanic	111,080	36.6%	115,881	38.2%	303,548
Black/African American, non-Hispanic	23,485	49.7%	24,770	52.4%	47,276
Asian, non-Hispanic	57,595	41.4%	63,378	45.6%	139,127
American Indian/Alaska Native, non-Hispanic	682	37.1%	778	42.4%	1,837
Pacific Islander, non-Hispanic	585	43.9%	724	54.3%	1,334
Other, non-Hispanic	6,362	43.2%	6,597	44.8%	14,716
Hispanic	133,999	49.7%	162,961	60.5%	269,559
Total	333,788	42.9%	375,089	48.2%	777,397

Source: LACDA 2018-2023 Consolidated Plan, HUD CHAS data (2010-2014 ACS).

Table E-9 shows cost burden by tenure for the unincorporated areas. Nearly the same proportion of owners with a mortgage and renters experienced a cost burden. However, renters experienced severe cost burden at a higher rate. Only 37.7 percent of renters had no cost burden, compared to 53.7 percent of owners with a mortgage, and 85 percent of owners without a mortgage. **Figures E-18 (A)** through **(D)** compare overpayment by tenure over time using the 2010-2014 ACS and 2015-2019 ACS. Increases in cost burden can be used as an indicator for urban displacement (see *Displacement* section below).

Two census tracts in the Santa Monica Mountains saw increases in cost burdened homeowners. However, overpayment has generally decreased for homeowners since the 2010-2014 ACS. Some communities in northwestern Santa Clarita Valley, some communities in southwestern Antelope Valley, West Athens-Westmont, and Florence-Firestone saw a reduction in overpayment amongst homeowners. East Los Angeles and Hacienda Heights also had fewer overpaying homeowners.

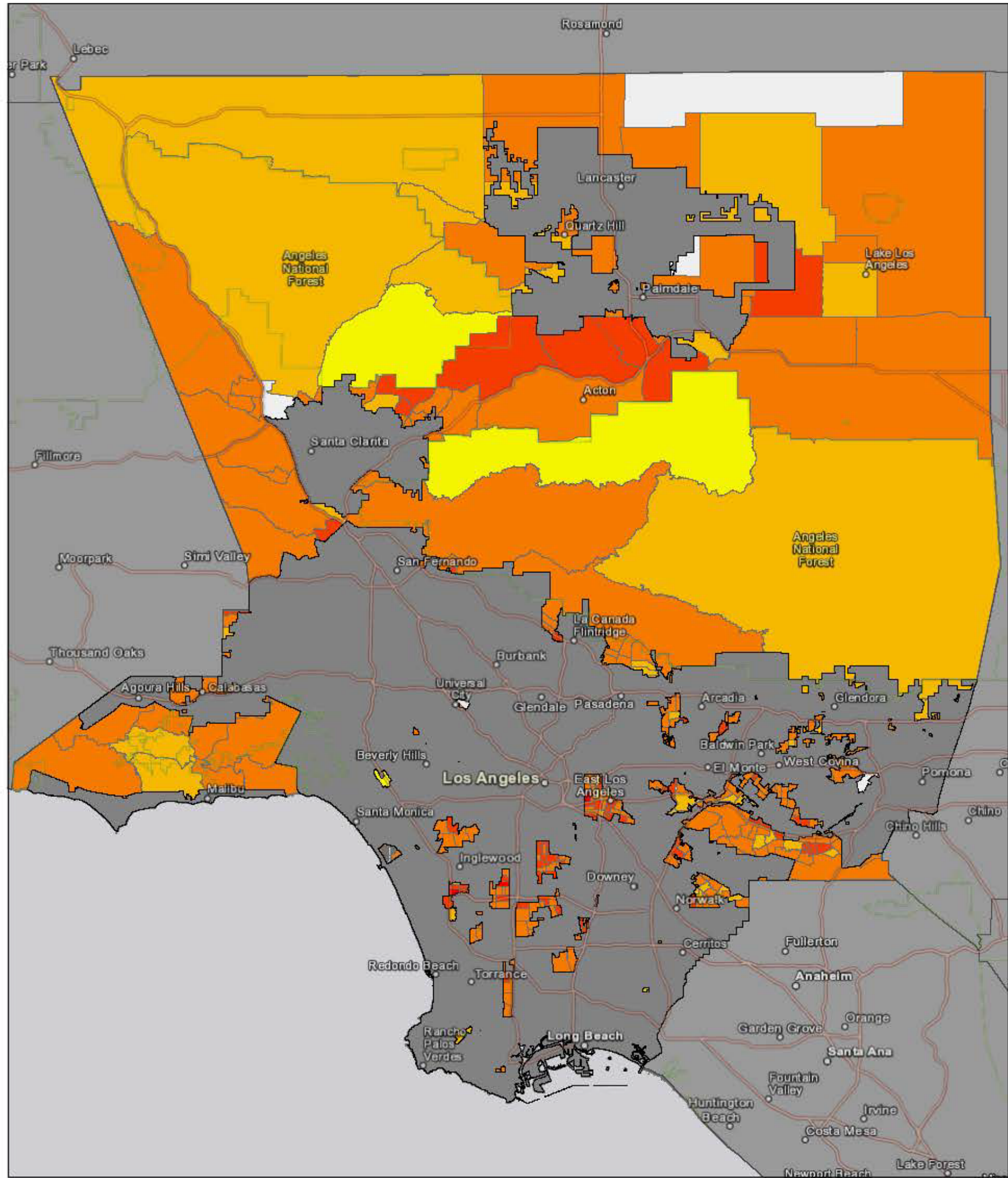
The proportion of overpaying renter households in the unincorporated areas varied. Many of the census tracts in northern Santa Clarita Valley and the Antelope Valley saw an increase in overpaying renter households. Cost burden amongst renter households in West Los Angeles (Sawtelle VA), Kagel/Lopez Canyons worsened since the 2010-2014 ACS, while several census tracts in West Rancho Dominguez, Ladera Heights, Alondra Park, and West Athens-Westmont had fewer cost burdened renter households.

Table E-9: Cost Burden by Tenure – Unincorporated Los Angeles County

Tenure	Total Households	No Cost Burden	Cost Burden	Severe Cost Burden	Not Computed
Owners with Mortgage	134,662	53.7%	25.6%	20.0%	0.7%
Owners without Mortgage	48,906	85.0%	6.8%	6.6%	1.6%
Renters	120,415	37.7%	25.9%	30.2%	6.1%
Total	303,983	52.4%	22.7%	21.9%	3.0%

Source: LACDA 2018-2023 Consolidated Plan, 2012-2016 ACS.

Figure E-18: (A) Overpayment - Homeowners (2010-2014)

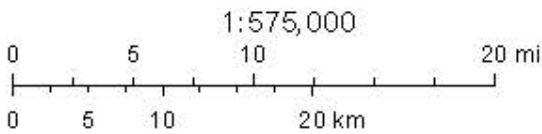


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- Incorporated City
- Surrounding Counties
- County Boundaries

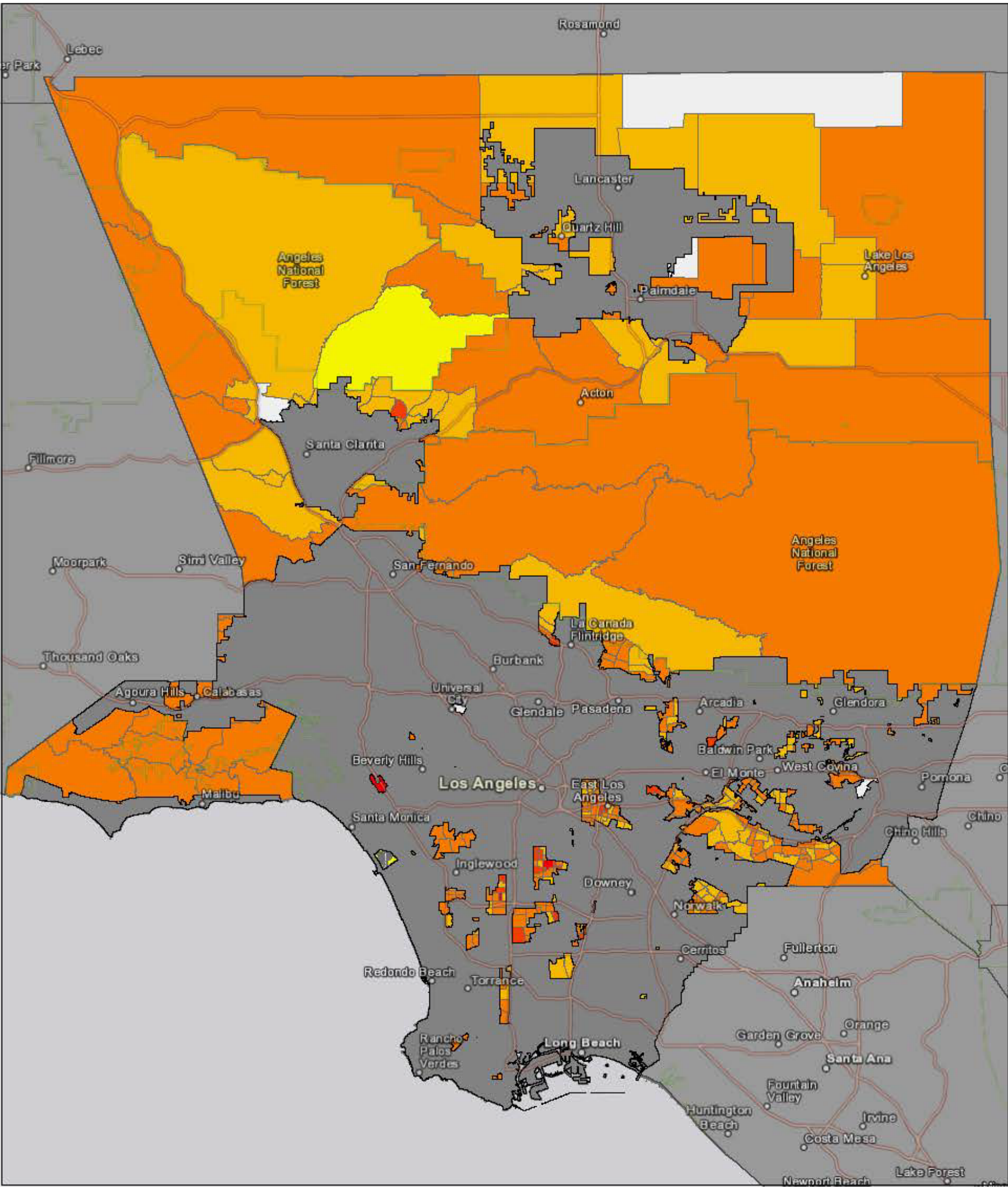
(A) Overpayment by Home Owners (ACS, 2010 - 2014) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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Figure E-18: (B) Overpayment - Homeowners (2015-2019)

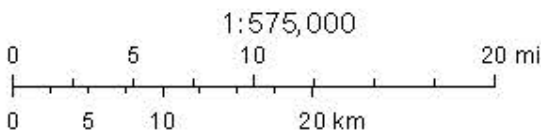


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- Incorporated City
- Surrounding Counties
- County Boundaries

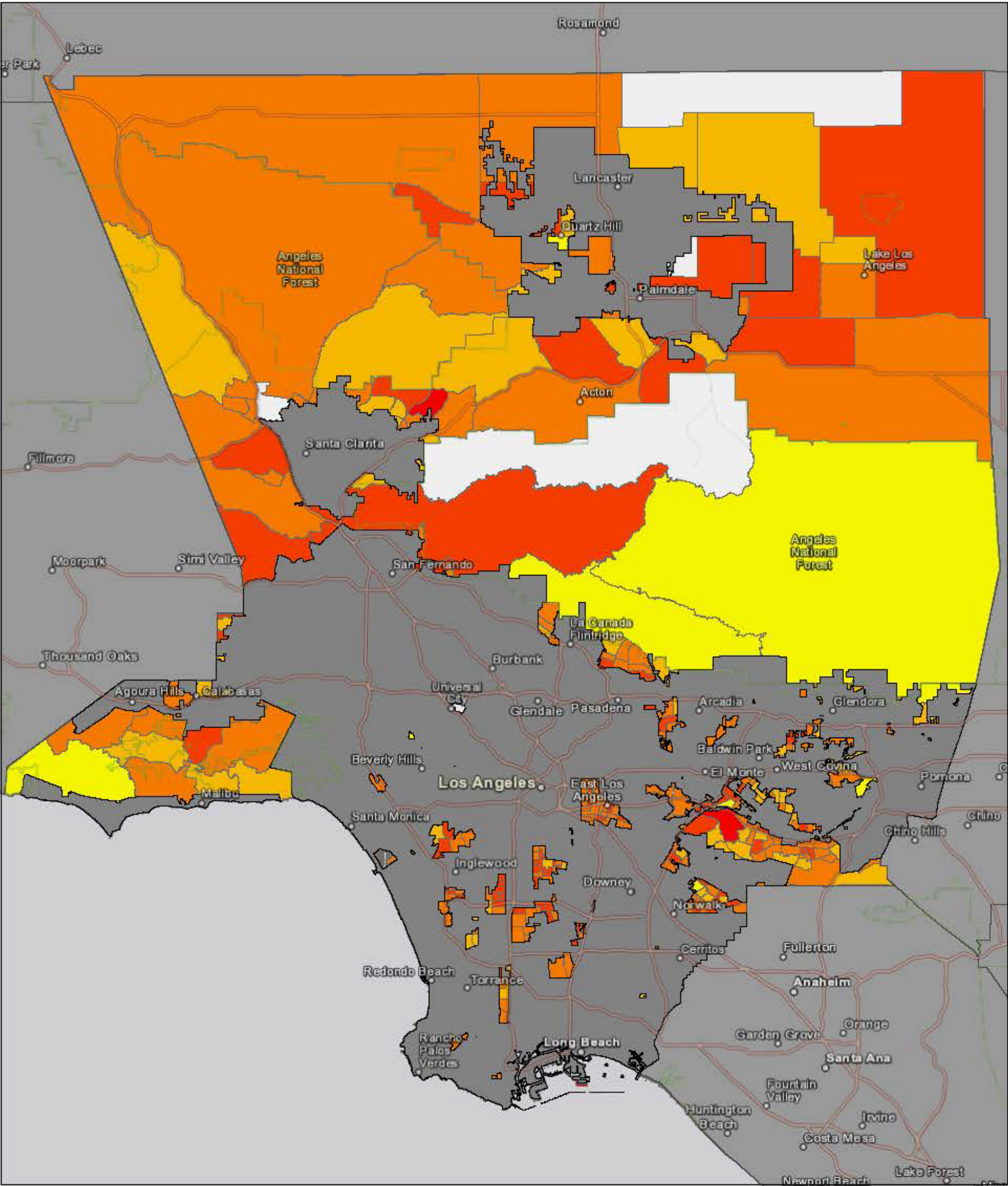
(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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Figure E-18: (D) Overpayment – Renters (2015-2019)

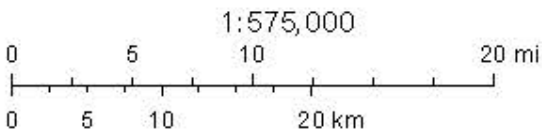


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- Incorporated City
- Surrounding Counties
- County Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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Overcrowding

As shown in **Table E-8**, nearly 50 percent of the residents of the Los Angeles Urban County experienced a housing problem, such as cost burden, incomplete kitchen or plumbing facilities, or overcrowding. As shown in **Table E-10**, approximately 8 percent of households in the unincorporated areas are overcrowded, including 4.4 percent severely overcrowded households. Overcrowding in the unincorporated areas was more common than throughout Los Angeles Urban County jurisdictions. Overcrowding was also more common in the unincorporated areas than in Los Angeles County, with a smaller proportion that was severely overcrowded.

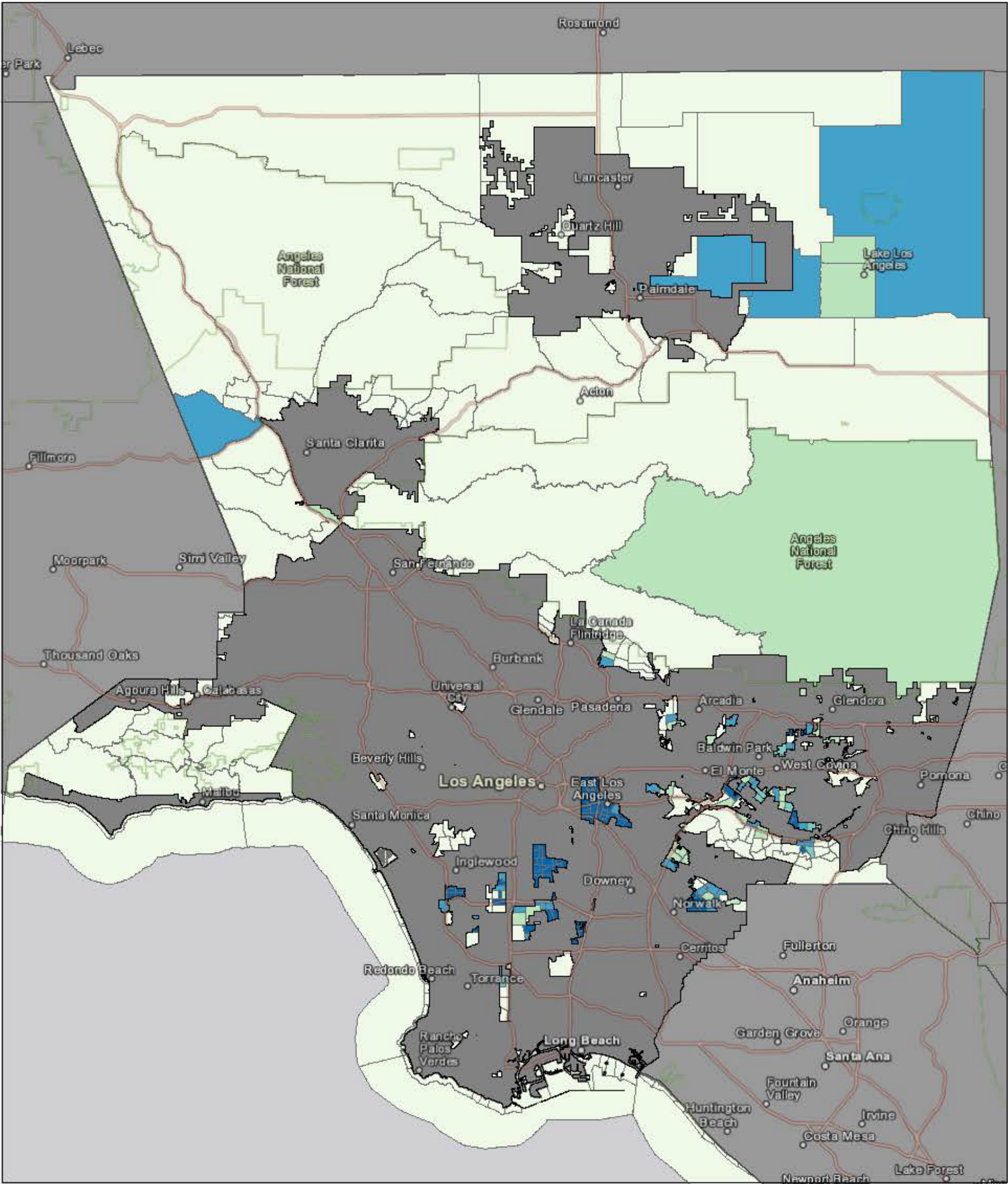
Figure E-19(A) and **Figure E-19(B)** show concentrations of overcrowded and severely overcrowded households by census tract. Census tracts within Lennox, West Athens-Westmont, West Rancho Dominguez, Willowbrook, East Rancho Dominguez, Florence-Firestone, Walnut Park, East Los Angeles, North Whittier, South Whittier-Sunshine Acres, Avocado Heights, South San Jose Hills, East Irwindale, and Covina Islands have higher (>20 percent) concentrations of overcrowded households. East Los Angeles and Florence-Firestone also have higher concentrations of severely overcrowded households.

Table E-10: Overcrowding

Jurisdiction	> 1 Person per Room		> 1.5 Persons per Room		Total Households
	Number	Percent	Number	Percent	
Unincorporated Areas	24,365	8.0%	13,315	4.4%	303,983
Los Angeles Urban County	47,711	6.1%	25,067	3.2%	782,957
Los Angeles County	228,909	7.0%	157,484	4.8%	3,281,845

Source: LACDA 2018-2023 Consolidated Plan, 2016-2020 ACS (5-Year Estimates).

Figure E-19: (A) Overcrowded Households by Census Tract



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- Incorporated City
- Surrounding Counties
- County Boundaries

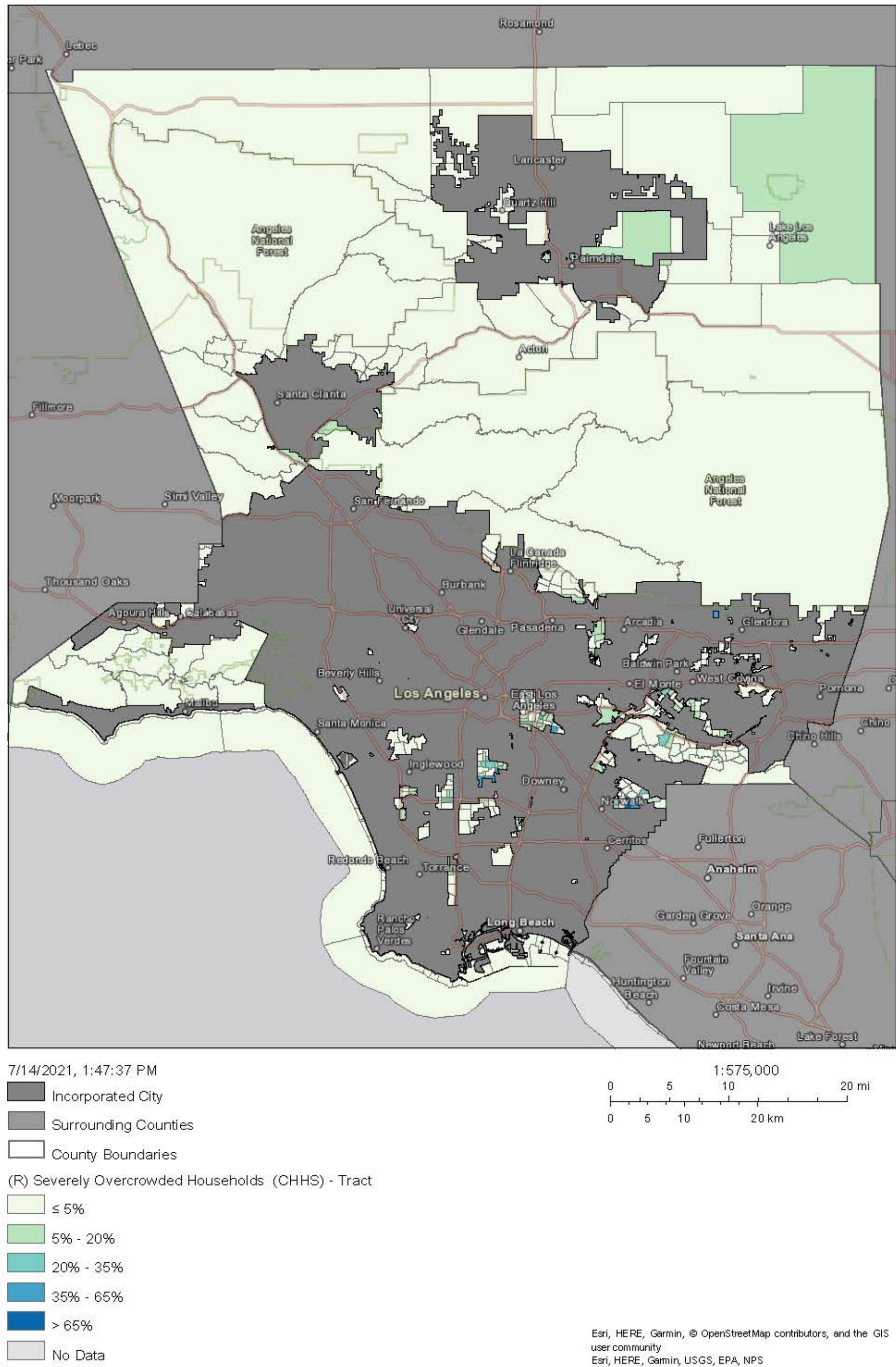
(R) Overcrowded Households (CHHS) - Tract

- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- > 20%

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Figure E-19: (B) Severely Overcrowded Households by Census Tract



Substandard Housing

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. In the unincorporated areas, only 0.4 percent of households lacked complete plumbing facilities, which is the same percentage countywide (**Table E-11**). Compared to Los Angeles Urban County jurisdictions and Los Angeles County, the unincorporated areas had the smallest proportion of households lacking kitchen facilities.

Table E-11: Substandard Housing Conditions

Jurisdiction	Lacking Complete Plumbing Facilities		Lacking Complete Kitchen Facilities		Total Households
	Number	Percent	Number	Percent	
Unincorporated Areas	1,111	0.4%	2,766	0.9%	303,983
Los Angeles Urban County	2,578	0.3%	8,898	1.1%	782,957
Los Angeles County	14,568	0.4%	50,923	1.6%	3,281,845

Source: LACDA 2018-2023 Consolidated Plan, 2016-2020 ACS (5-Year Estimates).

The County gathered data from the existing code enforcement programs and conducted a rental housing habitability survey. LACDA, DRP, DPH, and PW provided data on inspections and violations. For FY 2017-2018, LACDA conducted 8,639 Housing Quality Standards (HQS) inspections on 4,824 rental housing units in the unincorporated areas and found violations across 1,818 units. The majority of violations were minor deficiencies. DPH conducted inspections of 15,000 rental units and identified violations in 685 units. DRP inspected 145 units and 118 units were found to have violations, mainly from unpermitted units.

The Code Enforcement Workgroup (comprised of LACDA, DRP, DPH, and PW) also conducted a rental housing habitability survey of renters residing in cities and the unincorporated areas from July 2, 2019 to August 2, 2019. The Workgroup received 618 responses, of which 70 rented in the unincorporated areas. About 40 percent of respondents living in the unincorporated areas stated they had experienced uninhabitable, unsanitary, or unsafe conditions in their home within the previous two years. Of that 40 percent, 66 percent indicated that the conditions were never resolved.

Displacement Risk

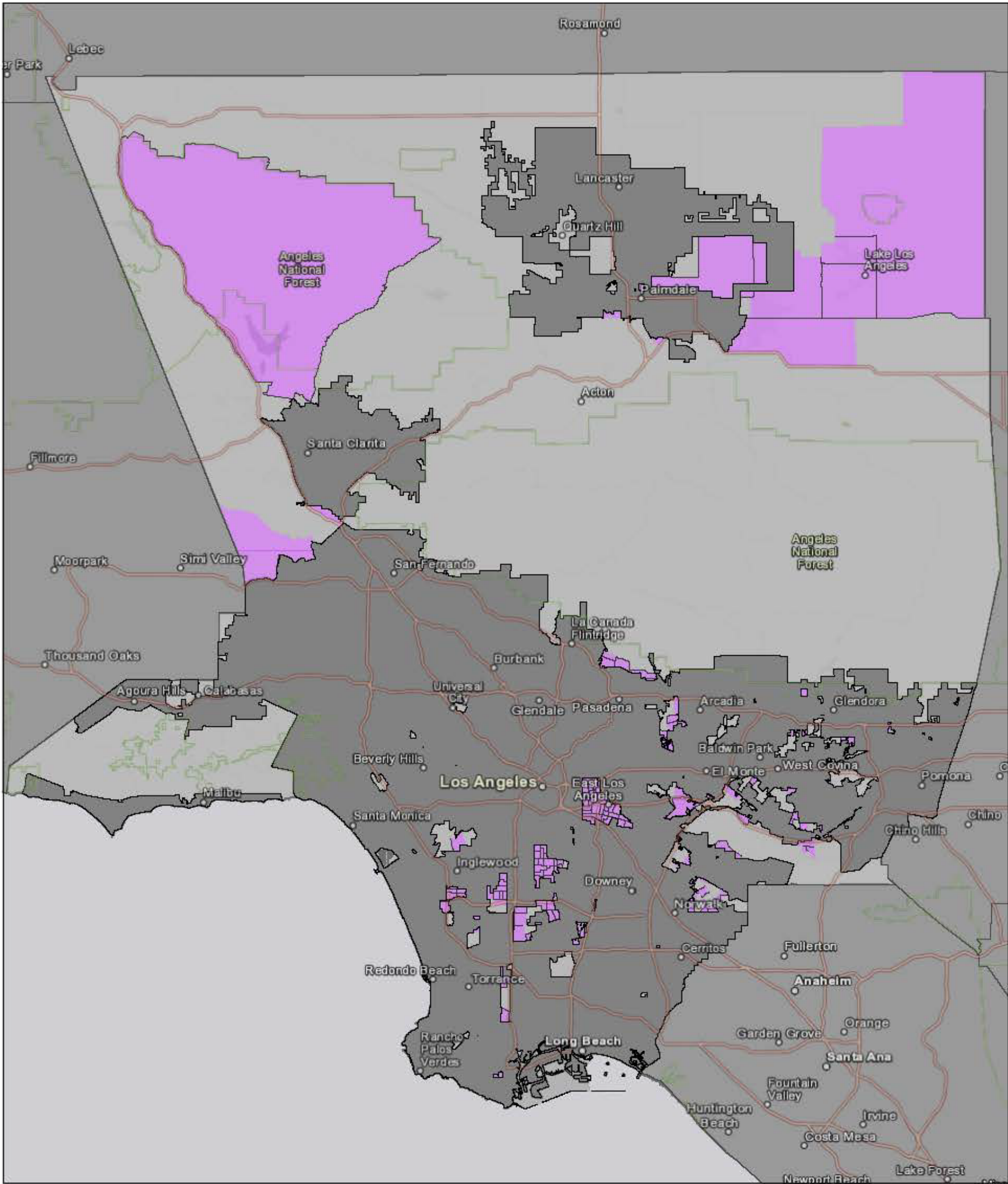
HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low income residents is above 20 percent; and
- The census 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 (50 percent AMI or below) that are severely rent burdened households is above the county median,
 - The census tract or areas in close proximity have been experiencing displacement pressures (percent change in rent above county median for rent increases), or
 - Difference between census tract median rent and median rent for surrounding census tracts above median for all census tracts in the county (rent gap).

Figure E-20 shows the sensitive communities in Los Angeles County. Urban displacement often disproportionately impacts sensitive communities, such as people of color, LMI populations, and persons with disabilities. The following are unincorporated areas at risk of displacement, with relevant factors:

- Lennox/Del Aire: One R/ECAP census tract in Lennox. These areas also have higher concentrations of people of color and LMI households.
- West Athens-Westmont: Two R/ECAP census tracts in West Athens-Westmont. The census tracts in this area have larger percentages of people of color and LMI households.
- Florence-Firestone/Walnut Park: There is one R/ECAP census tract in Florence-Firestone. These areas have higher concentrations of people of color and LMI households.
- Willowbrook/West Rancho Dominguez/East Rancho Dominguez: These areas have higher concentrations of people of color and LMI households. There is one R/ECAP census tract in Willowbrook.
- Northeast Antelope Valley: This area contains census tracts with higher concentrations of people of color and LMI households.
- East Los Angeles: This area contains census tracts with higher concentrations of people of color and LMI households.
- South Whittier/West Whittier-Los Nietos: These areas contain census tracts with higher concentrations of people of color and LMI households.
- South San Gabriel/East San Pasadena-East San Gabriel: These areas contain census tracts with higher concentrations of people of color and LMI households.
- Rowland Heights/Hacienda Heights: These areas contain census tracts with higher concentrations of people of color and LMI households.
- Windsor Hills: This area contains census tracts with higher concentrations of people of color.
- West Carson: This area contains census tracts with higher concentrations of people of color.
- Altadena: This area contains census tracts with higher concentrations of people of color.

Figure E-20: Sensitive Communities (Urban Displacement)



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- Incorporated City
- Surrounding Counties
- County Boundaries
- (A) Sensitive Communities (UCB, Urban Displacement Project)
- Vulnerable
- Other

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Lending Practices

As shown in **Table E-12**, between 2010 and 2015, the loan denial rate for all racial/ethnic groups unincorporated Los Angeles County decreased. As of 2015, the denial rate among Black, American Indian, and Hispanic applicants exceeds the 13.8 percent denial rate countywide. In addition to racial disparities in denial rates, females are also denied at a slightly higher rate (14.4 percent) than males (13.2 percent), according to the 2015 data included in the County AI.

Table E-12: Loan Types and Denial Rates by Race/Ethnicity

Type or Race/Ethnicity	2010	2015
Home Purchase	118,553	100,713
Home Improvement	9,990	17,598
Refinancing	259,808	231,311
Total	388,351	349,622
Denial Rate	19.0%	13.8%
American Indian	21.3%	15.8%
Asian	15.1%	13.4%
Black	25.0%	20.3%
White	19.1%	12.8%
Not available	21.9%	17.2%
Not applicable	4.8%	7.0%
Non-Hispanic	16.6%	13.0%
Hispanic	22.9%	14.4%

Summary of Fair Housing Issues

Table E-13, below, summarizes the fair housing issues identified in the 2018 Regional Analysis of Fair Housing. Fair housing issues were most prevalent in the following unincorporated areas:

- Antelope Valley (northeastern)
- East Los Angeles
- Florence-Firestone
- Lennox
- West Athens-Westmont
- Willowbrook

Table E-13: Summary of Fair Housing Issues

Fair Housing Issue	Summary
<i>Enforcement and Outreach</i>	<ul style="list-style-type: none"> • In FY 2019-2020, 83 fair housing cases were opened; 47 percent related to physical disability, 22 percent related to mental disability, and 19 percent related to source of income. • HRC conducts outreach and education throughout the Los Angeles Urban County annually. • LACDA has committed to complying with the Fair Housing Act and related regulations.
<i>Integration and Segregation</i>	
Race/Ethnicity	<ul style="list-style-type: none"> • 76 percent of households and 81 percent of the population is part of a non-White group. • Dissimilarity between White and non-White communities has worsened. Non-White/White, Black/White and Hispanic/White communities remain highly segregated as of 2020. • Rowland Heights, Hacienda Heights, East Los Angeles, West Puente Valley, Walnut Park, West Whittier, South Whittier, View Park, Windsor Hills, and communities in northeastern Antelope Valley have high concentrations of people of color.
Disability	<ul style="list-style-type: none"> • Nearly 10 percent of Los Angeles County residents experience a disability. • Discrimination complaints related to physical disability (47 percent) and mental disability (22 percent) were the most common. • Census tracts with a high number of residents with disabilities are generally not concentrated in one area; West Los Angeles (Sawtelle VA) and northeastern Santa Clarita Valley have the highest concentration of persons with disabilities.
Familial Status	<ul style="list-style-type: none"> • Tracts with larger populations of children in married couple households are located in West Athens-Westmont, Lennox, and East Los Angeles. • Larger populations of children in female-headed households are more concentrated in West-Athens Westmont, Lennox, Florence-Firestone and eastern Antelope Valley areas.
Income	<ul style="list-style-type: none"> • Approximately 44 percent of households in the Los Angeles Urban County are lower income. • LMI populations are concentrated in Lennox, West Athens-Westmont, Florence-Firestone, Willowbrook, West Los Angeles (Sawtelle VA), East Los Angeles, West Puente Valley, some northeastern communities in the Antelope Valley, and some northeastern communities in the Santa Clarita Valley.
<i>Racially or Ethnically Concentrated Areas of Poverty</i>	
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	<ul style="list-style-type: none"> • R/ECAPs are located in the following unincorporated communities: West Athens-Westmont, Florence-Firestone, Lennox, West Los Angeles (Sawtelle VA), and Willowbrook.
Racially or Ethnically Concentrated Areas of Affluence (RCAAs)	<ul style="list-style-type: none"> • Unincorporated census tracts in the Santa Monica Mountains, Altadena, some communities in northeastern Santa Clarita Valley, and some communities in southwestern Antelope Valley have higher concentrations of non-Hispanic White populations and median incomes exceeding \$125,000.
<i>Access to Opportunities</i>	
Economic	<ul style="list-style-type: none"> • The following unincorporated communities contain tracts with very low economic scores (<0.25): West Los Angeles (Sawtelle VA), Lennox, Florence-Firestone, West Athens-Westmont, East Los Angeles, and some communities in eastern Antelope Valley. • Census tracts in the unincorporated areas with very low economic scores are generally dispersed throughout Los Angeles County.

Table E-13: Summary of Fair Housing Issues

Fair Housing Issue	Summary
Education	<ul style="list-style-type: none"> The following unincorporated areas contain census tracts with very low education scores (<0.25): View Park, Windsor Hills, East Los Angeles, West Athens-Westmont, Willowbrook, West Rancho Dominguez, Florence-Firestone, Sylmar Island, Kagel/Lopez Canyons, some communities in northern Santa Clarita Valley, some eastern communities in eastern Antelope Valley, Covina Islands, South Jose Hills, and parts of the Santa Monica Mountains.
Environmental	<ul style="list-style-type: none"> The following unincorporated communities contain tracts with very low environmental health scores (<0.25): West Los Angeles (Sawtelle VA), Florence-Firestone, West Carson, Rancho Dominguez, East Los Angeles, Willowbrook, West Rancho Dominguez, South San Gabriel, Avocado Heights, North Whittier, Hacienda Heights, West San Dimas, Walnut Islands, Sylmar Island, Kagel/Lopez Canyons, and some communities in northern Santa Clarita Valley. Census tracts in the unincorporated areas with very low environmental health scores are most concentrated are generally dispersed throughout Los Angeles County.
Transportation	<ul style="list-style-type: none"> Outside of the northern and western County, which do not have unincorporated communities in HQTAs, there are several unincorporated communities that fall within HQTAs.
Disproportionate Housing Needs	
Cost Burden	<ul style="list-style-type: none"> Approximately 48.2 percent of households in the Los Angeles Urban County have one or more housing problems, including 42.9 percent that are cost burdened. All racial and ethnic groups in the Los Angeles Urban County experience cost burden at a higher rate than non-Hispanic White residents (36.6 percent cost burdened); Black and Hispanic households have the highest rate of cost burden (both 49.7 percent). 13.3 percent of owners without a mortgage are cost burdened or severely cost burdened, compared to 45.6 percent of owners with a mortgage, and 56.1 percent of renters. Overpayment has generally decreased for homeowners in the unincorporated areas since the 2010-2014 ACS. Overpayment among renter households has fluctuated throughout Los Angeles County. Increases in overpaying renter households are generally not concentrated in one area.
Overcrowding	<ul style="list-style-type: none"> Approximately 8 percent of the households in the unincorporated areas are overcrowded, including 4.4 percent severely overcrowded. Overcrowding is more common in the unincorporated areas than in the Los Angeles Urban County (6.1 percent overcrowded) and Los Angeles County (7 percent overcrowded). Overcrowded households are most concentrated in unincorporated tracts in West Athens-Westmont, Florence-Firestone, Lennox, East Los Angeles, and North Whittier.
Substandard Housing	<ul style="list-style-type: none"> Approximately 0.4 percent of the households in the unincorporated areas lack complete plumbing facilities and 0.9 percent lack complete kitchen facilities. Lack of complete plumbing facilities is comparable to the Los Angeles Urban County and Los Angeles County (0.3 percent and 0.4 percent, respectively); fewer households in the unincorporated areas lack complete kitchen facilities compared to the Los Angeles Urban County (1.1 percent) and Los Angeles County (1.6 percent).
Displacement Risk	<ul style="list-style-type: none"> The following unincorporated areas have higher concentrations of census tracts that are considered sensitive communities: West Athens-Westmont, View Park, Windsor Hills, East Los Angeles, Altadena, East Pasadena, East San Gabriel, South San Gabriel, northern Santa Clarita Valley communities, and eastern Antelope Valley communities.

The 2018 AI identified the following impediments to fair housing choice in the Los Angeles Urban County. Discussions exclusively pertinent to the unincorporated areas are not available. However, the unincorporated areas comprise of about 43 percent of the population of the Los Angeles Urban County. The following impediments are considered “high priority.” The following are high priority issues relevant to the unincorporated areas:

1. **Barriers to mobility and lack of accessible housing in a range of unit sizes.** The 2018 AI included a survey in which over a third of respondents with a disability experienced difficulty getting around their neighborhood or housing complex, and approximately 10 percent of respondents indicated that their homes had problems limiting accessibility. According to the 2014-2018 ACS, nearly 10 percent of Los Angeles County residents experience a disability. The 2017-2018 Resident Survey included in the 2018 AI found that, countywide, the rated need for housing for persons with disabilities was 3.28 out of 4.
2. **Lack of affordable housing in a range of sizes and land use/planning decisions restricting affordable housing.** Approximately 74 percent of large family households in Los Angeles County experienced a housing problem, such as cost burden or overcrowding, according to the 2018 AI. Over 20 percent of all households in Los Angeles County have 5 or more persons. In the Los Angeles Urban County, 43 percent of households pay more than 30 percent of their income in rent. Affordable housing projects were found to be disproportionately located in or adjacent to R/ECAPs.
3. **Lack of sufficient publicly supported housing for persons with HIV/AIDS.** The 2018 AI reported that approximately 60,000 residents in Los Angeles County live with HIV/AIDS. The Hispanic population was found to be disproportionately affected.
4. **Significant disparities in the proportion of members of protected classes experiencing substandard housing when compared to the total population.** People of color, people with disabilities, families with children, and other protected classes face housing problems at higher rates than the total population. Black and Hispanic households were more likely to experience a housing problem, including cost burden, countywide.
5. **Noise pollution due to plane traffic from Los Angeles International Airport.** The 2018 AI estimates that 8,424 dwelling units are impacted by noise from LAX. Some unincorporated communities, including Marina del Rey, Lennox, and Del Aire, are located in the proximity of LAX; therefore, some unincorporated areas residents may be exposed to excessive noise generated by air traffic.
6. **Poor land use and zoning situating sources of pollution and environmental hazards near housing.** R/ECAPs in the Los Angeles Urban County tend to have higher levels of toxic emissions and environmental hazards.
7. **Lack of information on affordable housing and lack of knowledge of Fair Housing, Section 504 and ADA laws.** Access to information about affordable housing was found to be limited countywide. Nearly 40 percent of Fair Housing Survey respondents reported that they were not aware of their right to request reasonable accommodations. The County does include information about housing discrimination and retaliation, including where to file discrimination complaints, on its website.
8. **Increasing measures of segregation; lack of opportunities for residents to obtain housing**

in higher opportunity areas; lack of resources and services for working families (e.g., helping find housing for people of color). There are five unincorporated areas with R/ECAP census tracts. As described in the *Access to Opportunities* section, communities with lower economic, education, and jobs proximity indices often also have high concentrations of people of color, children in female-headed households, and LMI populations. The 2018 AI reported that higher income households tend to have more knowledge about housing and other services than lower income households.

9. **Discrimination in private rental and homes sales market, including the private accessible rental markets.** According to the 2019 Home Mortgage Disclosure Act (HMDA) data provided by Lending Patterns for Los Angeles County, White, non-Hispanic residents were approved for housing loans at a rate of 64.5 percent, while non-White residents were approved at a rate of 60.7 percent. American Indian/Alaska Native residents were approved at the lowest rate (47.2 percent) and Asian residents were approved at the highest rate (67 percent). Black/African American residents and Hispanic residents were approved at a rate of 53.4 percent and 58.6 percent, respectively. Disability discrimination complaints were the most common in Los Angeles County according to HUD Fair Housing Complaint data.
10. **Public safety concerns and juvenile crime activity.** Approximately 37 percent of Fair Housing Survey respondents living in R/ECAPs reported that they felt unsafe in their neighborhood at night and approximately 20 percent of all Los Angeles Urban County survey respondents reported feeling unsafe in their neighborhood at night. There are five unincorporated areas with R/ECAPs census tracts. Juvenile crime activity was found to be most prevalent in lower income communities countywide.
11. **Increase independence for the elderly or families with disabilities.** Similar to statewide trends, the population in the unincorporated areas has aged in recent years. Between 2000 and 2018, the 55-64 age group in the unincorporated areas grew from 7.2 percent to 12.1 percent. Conversely, the 5-20 age group declined from 26.8 percent in 2000 to 20.4 percent in 2018. Nearly 20 percent of unincorporated areas residents experienced a disability.
12. **People with disabilities becoming homeless; enhance programs to help at-risk homeless population.** The 2018 AI reported that over 15 percent of the homeless population in Los Angeles County had a physical disability and more than 3 percent had a developmental disability. According to the 2020 LAHSA Homeless Count, there are approximately 66,436 homeless persons living in Los Angeles County, which is an increase of 13 percent since 2019. Within the unincorporated areas, the homeless population increased 7.8 percent from 5,646 persons in 2019 to 6,088 persons in 2020.
13. **Illegal dumping – Proximity to environmental hazards, especially in communities of color.** Low income households and Latino, Black, NHOPI, and Native American households are most likely to live in areas with high pollution levels according to the 2018 AI.
14. **Disconnect in matching people with disabilities with the right housing resources.** In addition to the 40 percent of survey respondents that reported they were unaware of their right to request reasonable accommodations, 11 percent were in need of one.
15. **Disparities in job readiness and educational achievement.** As shown in **Figure E-14**, areas with lower education index scores often overlap with areas with higher concentrations of people of color, children in female-headed households, or LMI populations.

SITES INVENTORY AND REZONING

The County has been allocated a Regional Housing Needs Allocation (RHNA) of 90,052 units:

- 25,648 very low income units
- 13,691 low income units
- 14,180 moderate income units
- 36,533 above moderate income units

The County must identify adequate sites for accommodating the RHNA for all income groups. Typically, sites that are zoned for higher density multifamily housing are considered adequate to facilitate lower income housing. Based on the County's current land use policies and development regulations, the County would not be able to accommodate its RHNA without rezoning.

For the purpose of land use planning, the unincorporated areas are divided into General Plan Planning Areas (PAs):

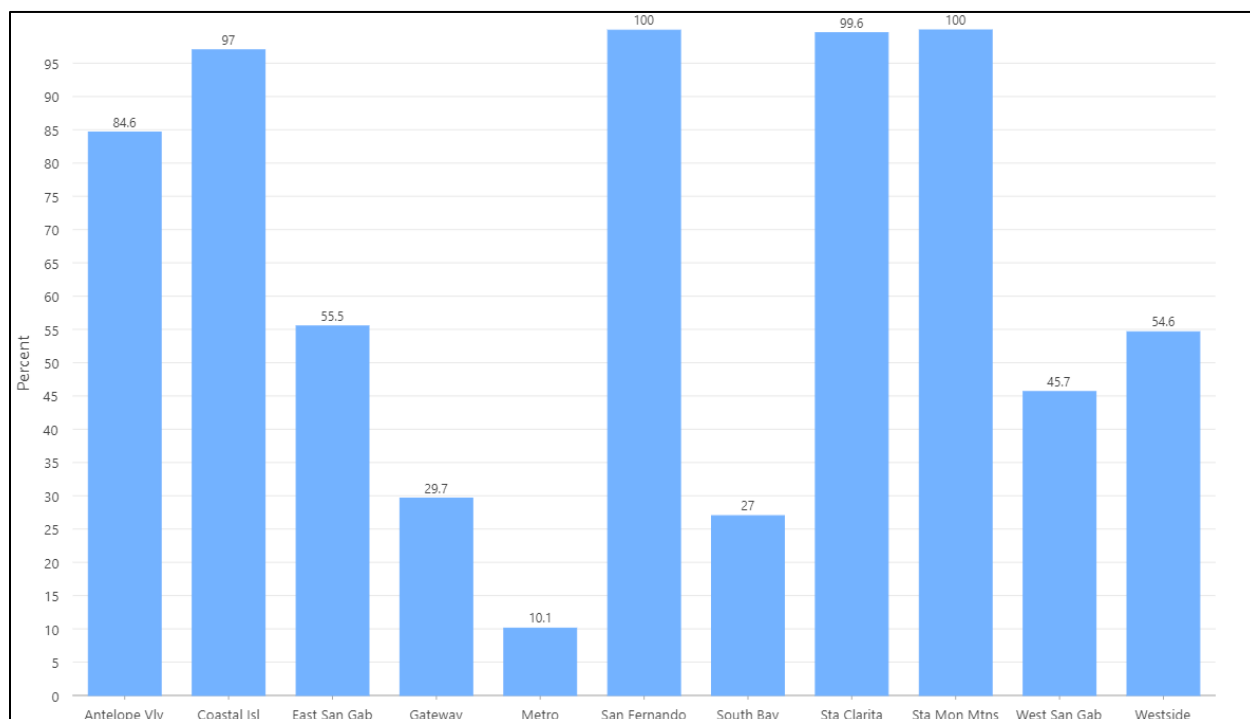
- Antelope Valley
- Coastal Islands
- East San Gabriel Valley
- Gateway
- Metro
- San Fernando Valley
- Santa Clarita Valley
- Santa Monica Mountains
- South Bay
- West San Gabriel Valley
- Westside

To identify adequate sites and also appropriate sites for rezoning, the County undertook an extensive process to objectively identify feasible sites for accommodating the RHNA. The criteria are described in detail in the Resources section of the Housing Element and Appendix G. From a fair housing perspective, the concern focuses on the overconcentration of lower income housing in areas already with disproportionate housing issues, high environmental burden, and limited access to resources and opportunities. This section evaluates the distribution of lower, moderate, and above moderate income units (adequate sites and rezone sites) across the PAs.

Due to the naturally constrained areas, such as biologically sensitive areas and Very High Fire Hazard Severity Zones, no lower income sites are identified for the Antelope Valley, Coastal Islands, San Fernando Valley, and Santa Monica Mountains planning areas. These planning areas have between 84.6 – 100 percent of their unincorporated land within a naturally a hazardous area or an area with natural resources, as shown in **Figure E-21**.⁹

⁹ While nearly all of the Santa Clarita Valley Planning Area is also naturally constrained, the areas outside the constraints have existing suburban and urban development with sites adequate to accommodate housing for lower income households, as shown in Table III-41 of the Housing Element.

Figure E-21: Percentage of Unincorporated Areas with Natural Constraints by Planning Area



Affirmatively Furthering Fair Housing Through Site Selection

Sites that are outside of the naturally constrained areas were prioritized for rezoning based on additional locational criteria and other factors. Specifically, as described in Appendix G, various criteria and weights were established and totaled to create a cumulative weight score to identify clusters of sites that are ideal for rezoning. To avoid overconcentration of lower income housing in areas with existing disproportionate housing issues, high environmental impact burden, and limited access to resources and opportunities, scores were given to or deducted from each parcel under two categories: Environmental Justice and Economic Mobility.

Environmental Justice

To encourage the equitable distribution of housing throughout unincorporated Los Angeles County, the Environmental Justice Screening Method (EJSM), which was developed by the County in partnership with the University of Southern California and Occidental College, was incorporated into the cumulative weight scoring system as one of the key determining factors. The EJSM illustrates cumulative health risks by identifying areas that are disproportionately burdened by and vulnerable to multiple types of pollution. Sites located in areas that are less burdened by and vulnerable to multiple types of pollution and health risks were given a higher score under this category.

Economic Mobility

To meet the goal of encouraging access to economic opportunity and to prevent further segregation and concentration of poverty, sites located in areas with more resources and opportunities in terms of educational attainment, employment, and economic mobility as identified on the California Tax Credit Allocation Committee (TCAC) Opportunity Map were given a higher score under this category.

It is important to note that in the cumulative weight scoring system, the maximum points given under each of these two categories were higher than the maximum points given under any other category. This demonstrates the County's deliberate effort to affirmatively further fair housing through the Sites Inventory and the Rezoning Program.

California Tax Credit Allocation Committee Composite Score Map

TCAC Opportunity Map categorizations for RHNA units by Planning Area are presented in **Table E-14**. The Opportunity Map for unincorporated Los Angeles County areas and RHNA units are shown in **Figure E-22**. As discussed previously, the Metro PA has the highest concentrations of low resource tracts and areas of high segregation and poverty.

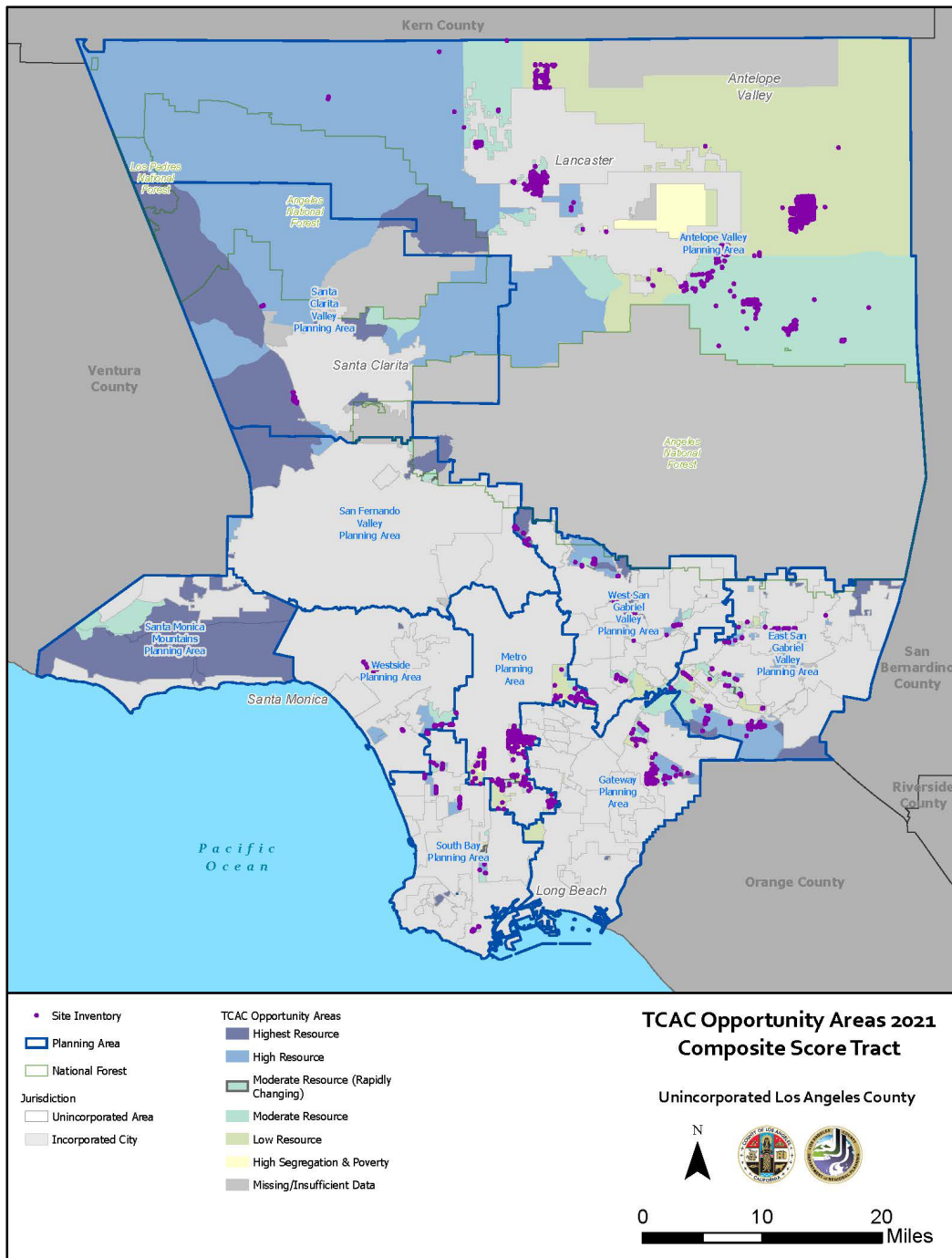
Overall, the majority (77.2 percent) of lower income units are in census tracts that are considered highest, high, and moderate resource areas, including moderate resource (rapidly changing). The Metro PA has the largest number of lower income units. Within the Metro Planning Area, more than half (54 percent) of the lower income units are located in moderate resource and moderate (rapidly changing) tracts, 33.5 percent are in low resource tracts, and 12.5 percent are in areas of high segregation and poverty. There are no lower income units in areas of high segregation and poverty in other Planning Areas. Approximately 50 percent of moderate income units are in moderate resource tracts, including moderate resource (rapidly changing), and 42 percent are in low resource tracts. A larger proportion of moderate income units are in high segregation and poverty areas compared to lower income units. Above moderate income units are generally dispersed amongst high resource tracts (30.9 percent), moderate resource tracts (40 percent), and low resource tracts (21.4 percent). There are 412 above moderate income RHNA units in areas of high segregation and poverty. Sites inventories and TCAC Opportunity Maps by Planning Area are included in **Figure E-23** through **Figure E-30**.

Table E-14: Distribution of RHNA Units (Sites Inventory and Rezoning) by TCAC Category

Planning Area	TCAC Category												Total Units
	Highest	High	Moderate	Moderate (Rapidly Changing)	Low	High Segregation and Poverty							
Lower Income RHNA Units													
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total Units in PA
East San Gabriel Valley	0.2%	11	52.1%	3,698	36.5%	2,592	0.0%	0	11.2%	791	0.0%	0	7,092
Gateway	6.8%	97	55.4%	787	13.8%	196	0.0%	0	23.9%	340	0.0%	0	1,420
Metro	0.0%	0	0.0%	0	40.4%	4,742	13.7%	1,603	33.5%	3,935	12.5%	1,462	11,742
Santa Clarita Valley	90.2%	1,063	9.8%	116	0.0%	0	0.0%	0	0.0%	0	0.0%	0	1,179
South Bay	0.0%	0	47.2%	1,395	51.7%	1,526	0.0%	0	1.1%	33	0.0%	0	2,954
West San Gabriel Valley	59.2%	1,920	23.2%	751	17.7%	573	0.0%	0	0.0%	0	0.0%	0	3,244
Westside	0.8%	28	53.4%	1,854	30.9%	1,073	0.0%	0	14.8%	515	0.0%	0	3,470
Total	10.0%	3,119	27.7%	8,601	34.4%	10,702	5.2%	1,603	18.1%	5,614	4.7%	1,462	31,101
Moderate Income RHNA Units													
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total Units in PA
Antelope Valley	0.0%	0	6.3%	81	44.6%	570	0.0%	0	48.9%	626	0.2%	2	1,279
Metro	0.0%	0	0.0%	0	40.0%	3,753	10.9%	1,026	41.1%	3,854	8.0%	751	9,384
Total	0.0%	0	0.8%	81	40.5%	4,323	9.6%	1,026	42.0%	4,480	7.1%	753	10,663
Above Moderate Income RHNA Units													
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total Units in PA

Planning Area	TCAC Category												Total Units
	Highest		High		Moderate		Moderate (Rapidly Changing)		Low		High Segregation and Poverty		
East San Gabriel Valley	0.0%	0	61.4%	2,561	24.3%	1,012	0.0%	0	14.4%	599	0.0%	0	4,172
Above Moderate Income RHNA Units													
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total Units in PA
Gateway	0.0%	0	24.2%	1,270	1.9%	101	0.0%	0	73.9%	3,880	0.0%	0	5,251
Metro	0.0%	0	0.0%	0	74.4%	4,687	1.4%	89	17.7%	1,112	6.5%	412	6,300
South Bay	0.0%	0	29.1%	1,105	70.9%	2,696	0.0%	0	0.0%	0	0.0%	0	3,801
West San Gabriel Valley	31.9%	1,352	42.4%	1,797	25.6%	1,086	0.0%	0	0.0%	0	0.0%	0	4,235
Westside	7.3%	184	54.5%	1,382	36.7%	929	0.0%	0	1.5%	39	0.0%	0	2,534
Total	5.8%	1,536	30.9%	8,115	40.0%	10,511	0.3%	89	21.4%	5,630	1.6%	412	26,293

Figure E-22: Distribution of RHNA Units (Sites Inventory and Rezoning) by TCAC Category



The following figures show TCAC Opportunity Maps and Sites Inventory by Planning Area. All Planning Areas have low resource tracts in the Sites Inventory areas except for the Santa Clarita Valley Planning Area shown in **Figure E-27** and the West San Gabriel Valley Planning Area shown in **Figure E-29**. The Antelope Valley Planning Area (**Figure E-23**) and Metro Planning Area (**Figure E-26**) have high segregation and poverty tracts in the Sites Inventory area. The Sites inventory areas by Planning Area contain the following Opportunity Map tract types:

- Antelope Valley Planning Area – high segregation and poverty, low, moderate, and high resource tracts
- East San Gabriel Valley Planning Area – low, moderate, high, and highest resource tracts
- Gateway Planning Area – low, moderate, high, and highest resource tracts
- Metro Planning Area – high segregation and poverty, low, moderate, and moderate (rapidly changing) resource tracts
- Santa Clarita Valley Planning Area –high and highest resource tracts
- South Bay Planning Area – low, moderate, and high resource tracts
- West San Gabriel Valley Planning Area – moderate, high, and highest resource tracts
- Westside Planning Area – low, moderate, high, and highest resource tracts

May 17, 2022

Figure E-23: Sites Inventory/Rezoning and TCAC Opportunity Map – Antelope Valley Planning Area

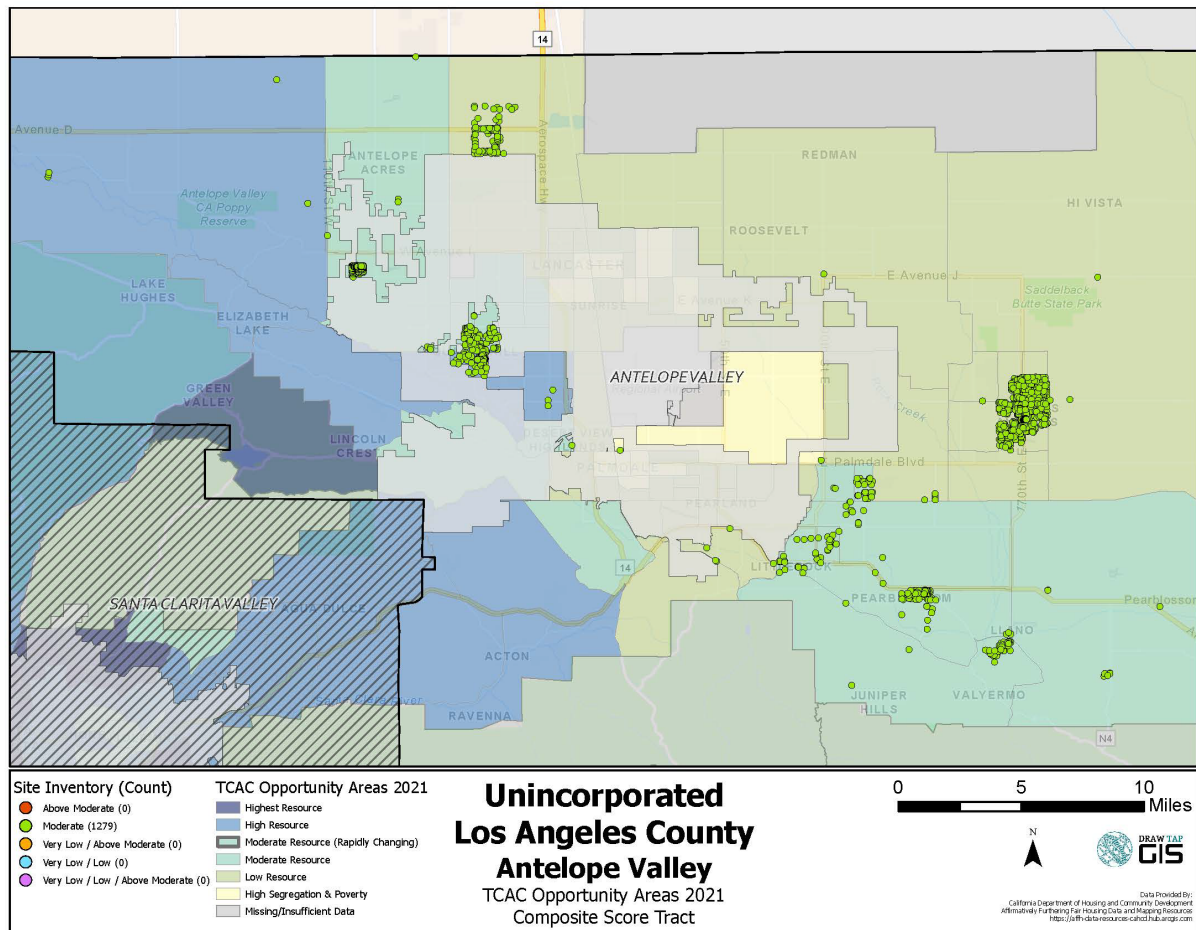


Figure E-24: Sites Inventory/Rezoning and TCAC Opportunity Map – East San Gabriel Valley Planning Area

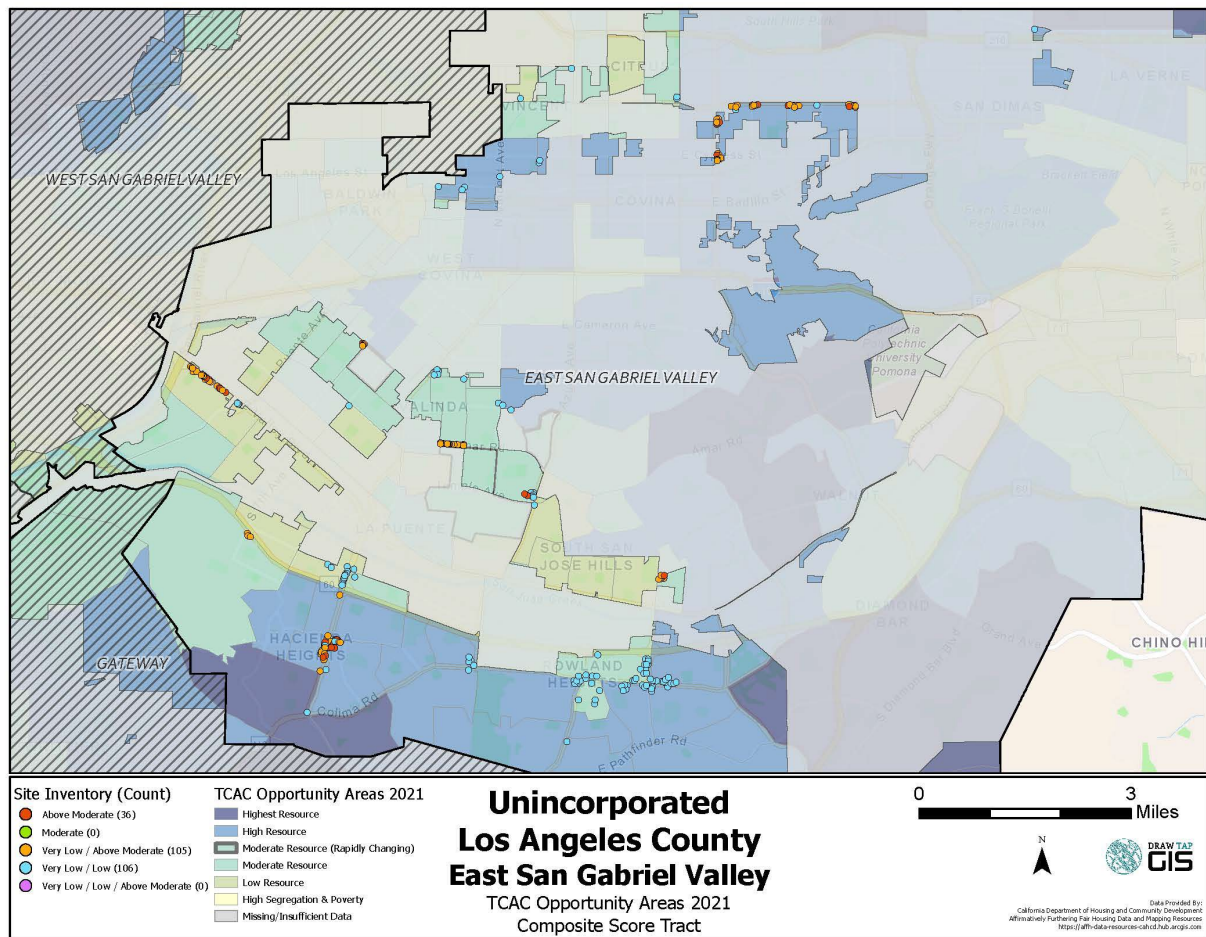


Figure E-25: Sites Inventory/Rezoning and TCAC Opportunity Map – Gateway Planning Area

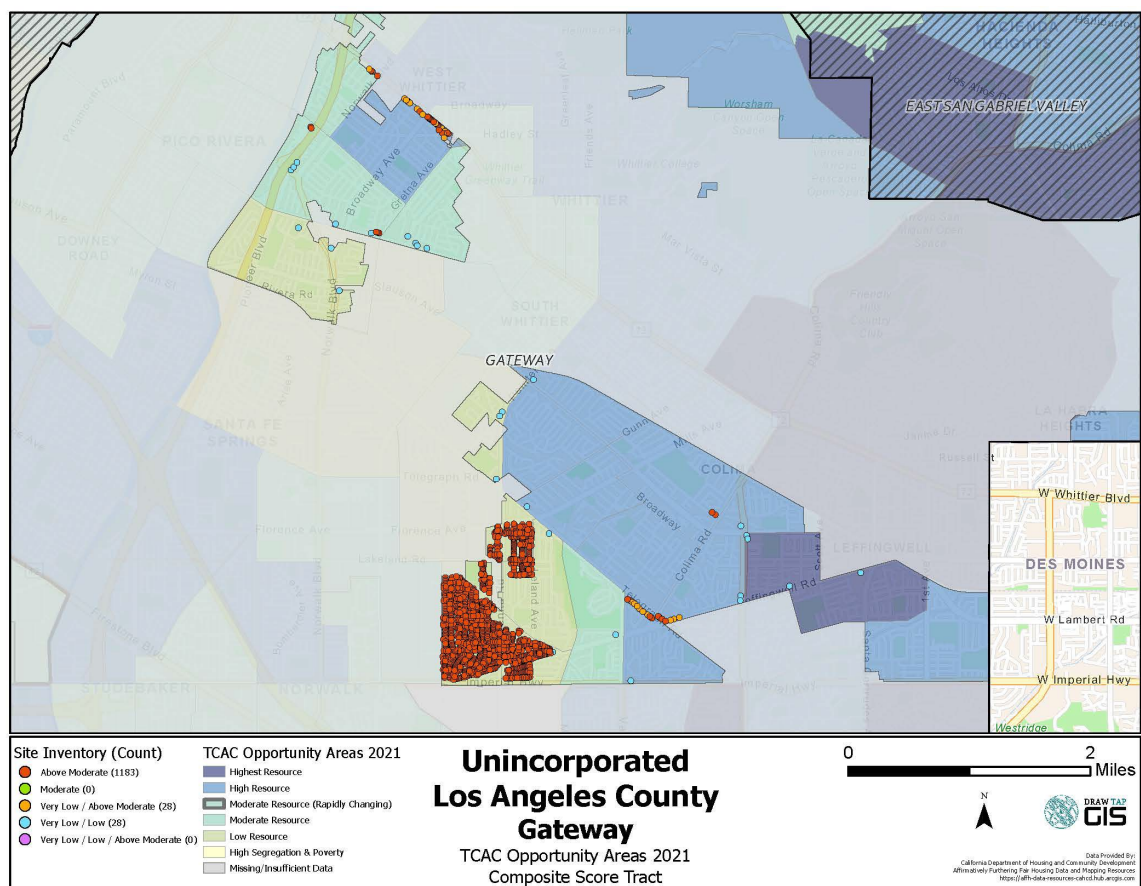


Figure E-26: Sites Inventory/Rezoning and TCAC Opportunity Map – Metro Planning Area

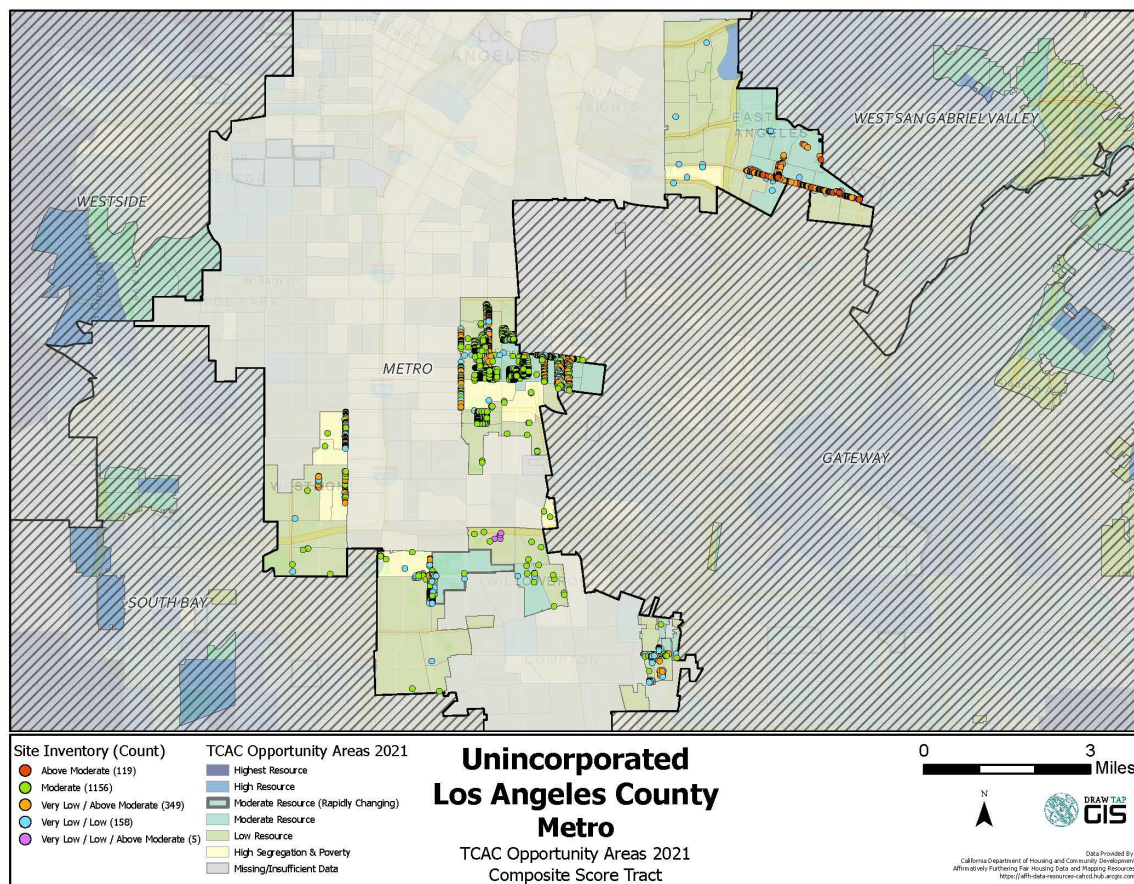


Figure E-27: Sites Inventory/Rezoning and TCAC Opportunity Map – Santa Clarita Valley Planning Area

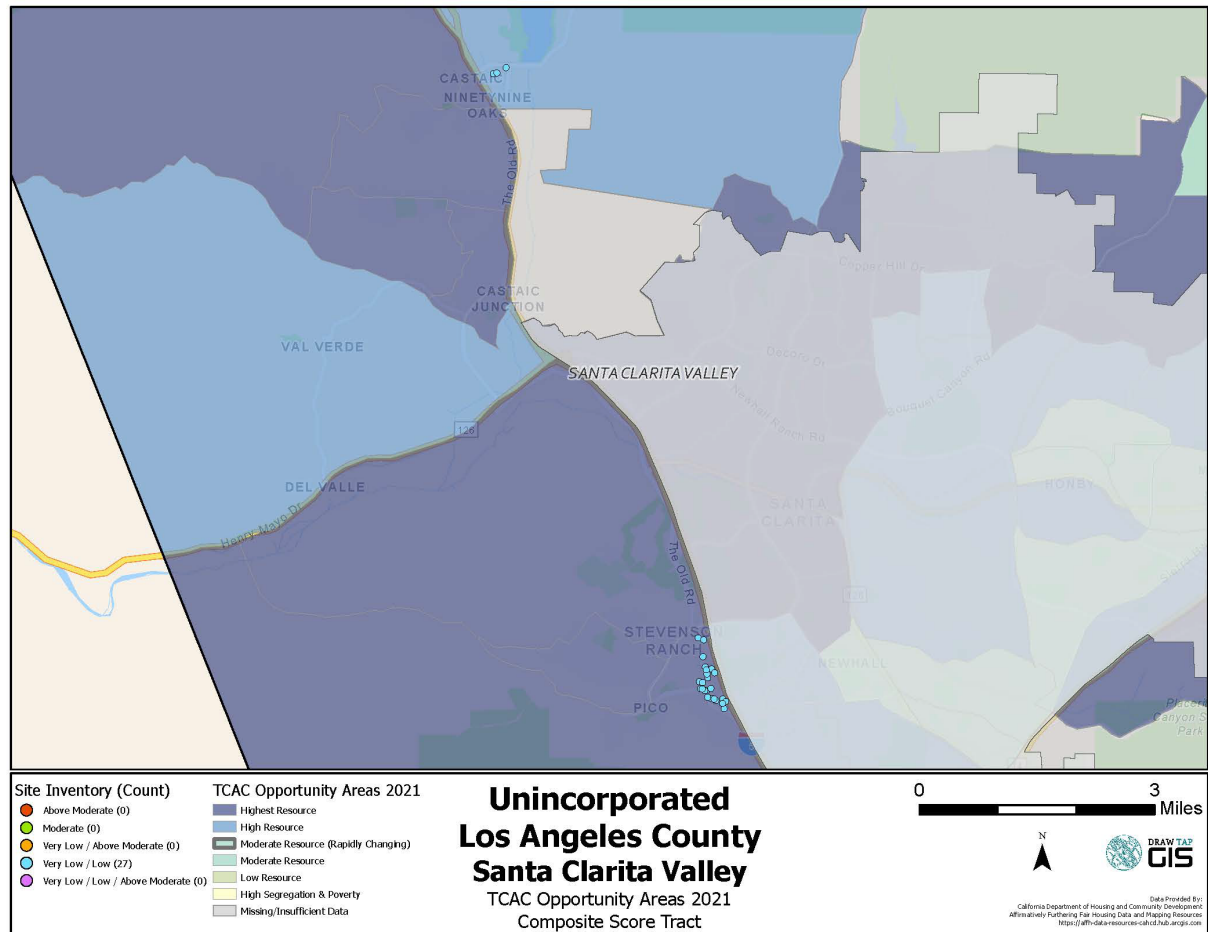


Figure E-28: Sites Inventory/Rezoning and TCAC Opportunity Map – South Bay Planning Area

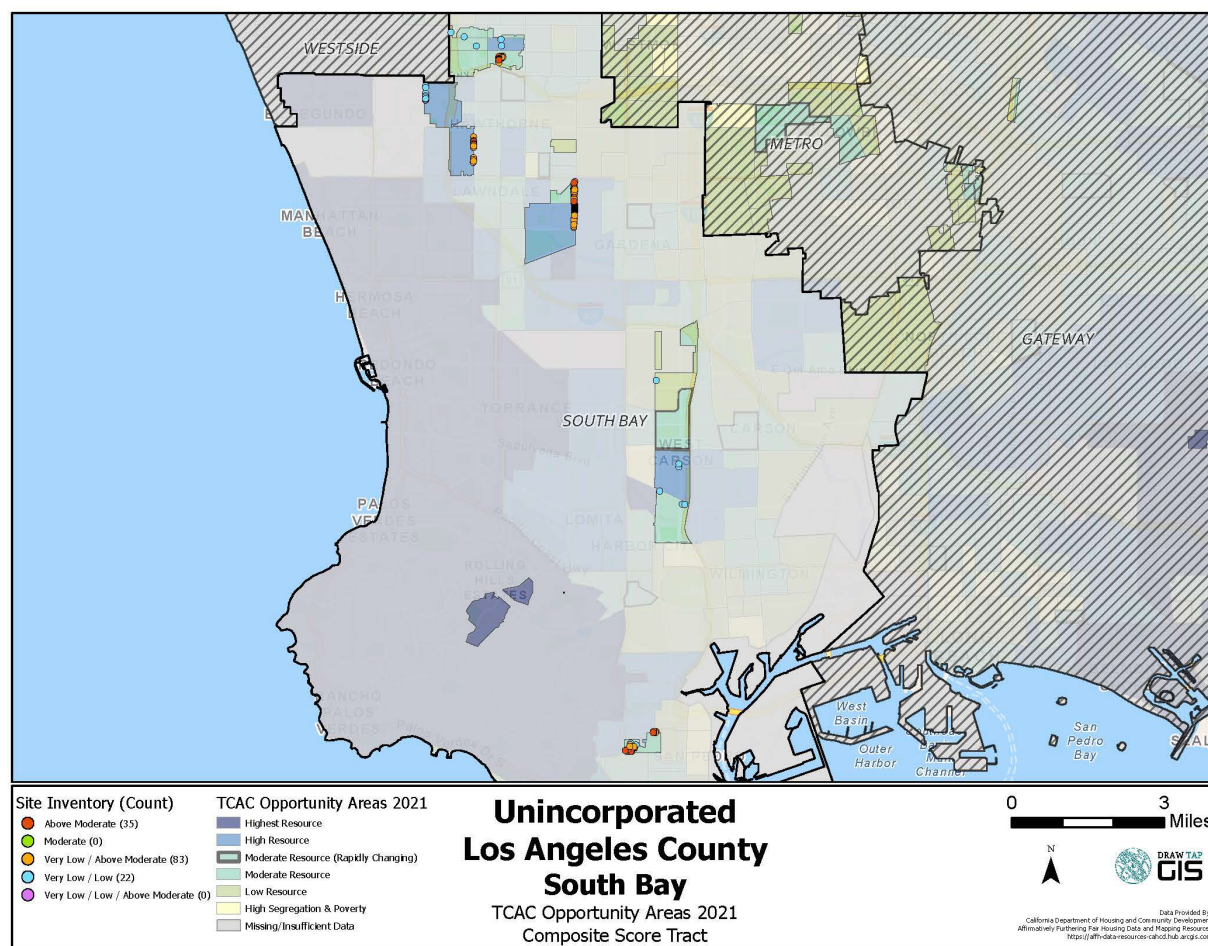


Figure E-29: Sites Inventory/Rezoning and TCAC Opportunity Map – West San Gabriel Valley Planning Area

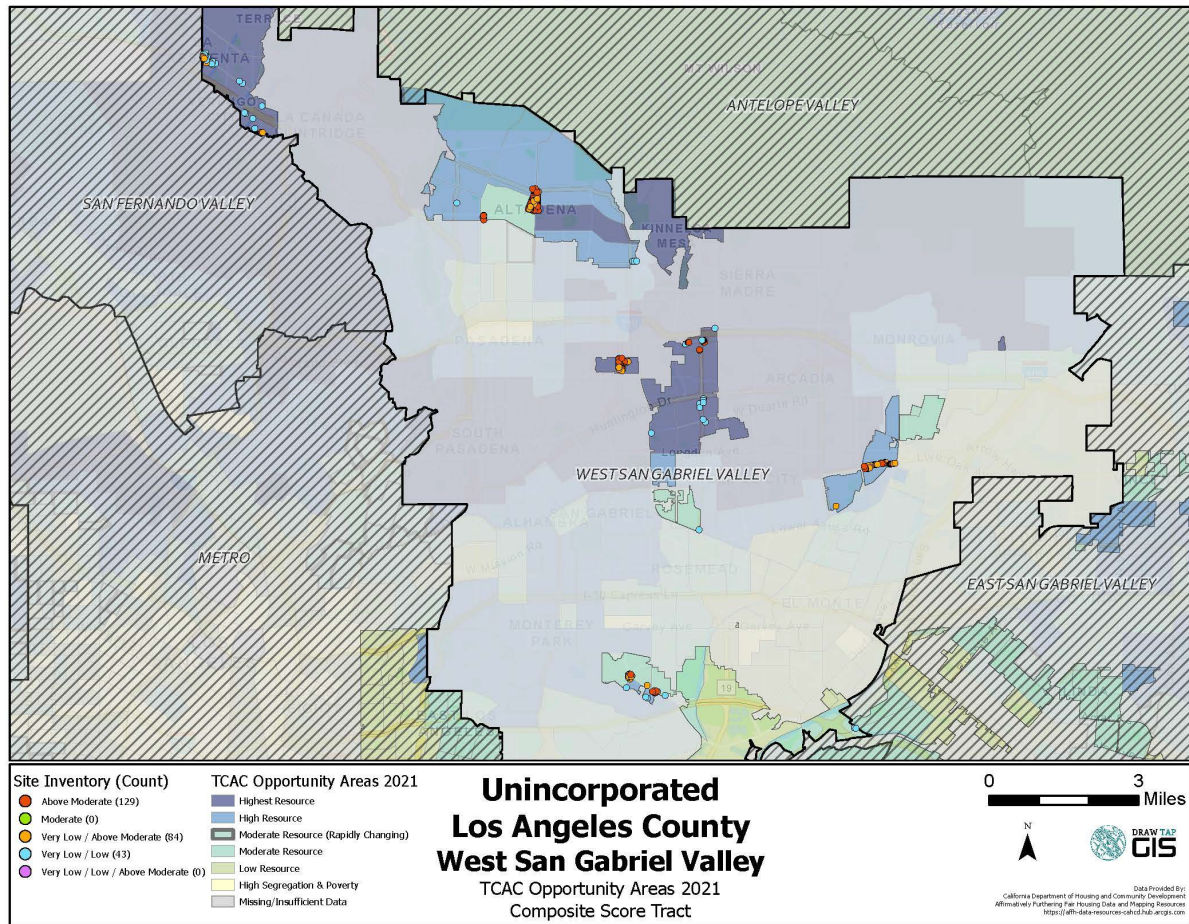
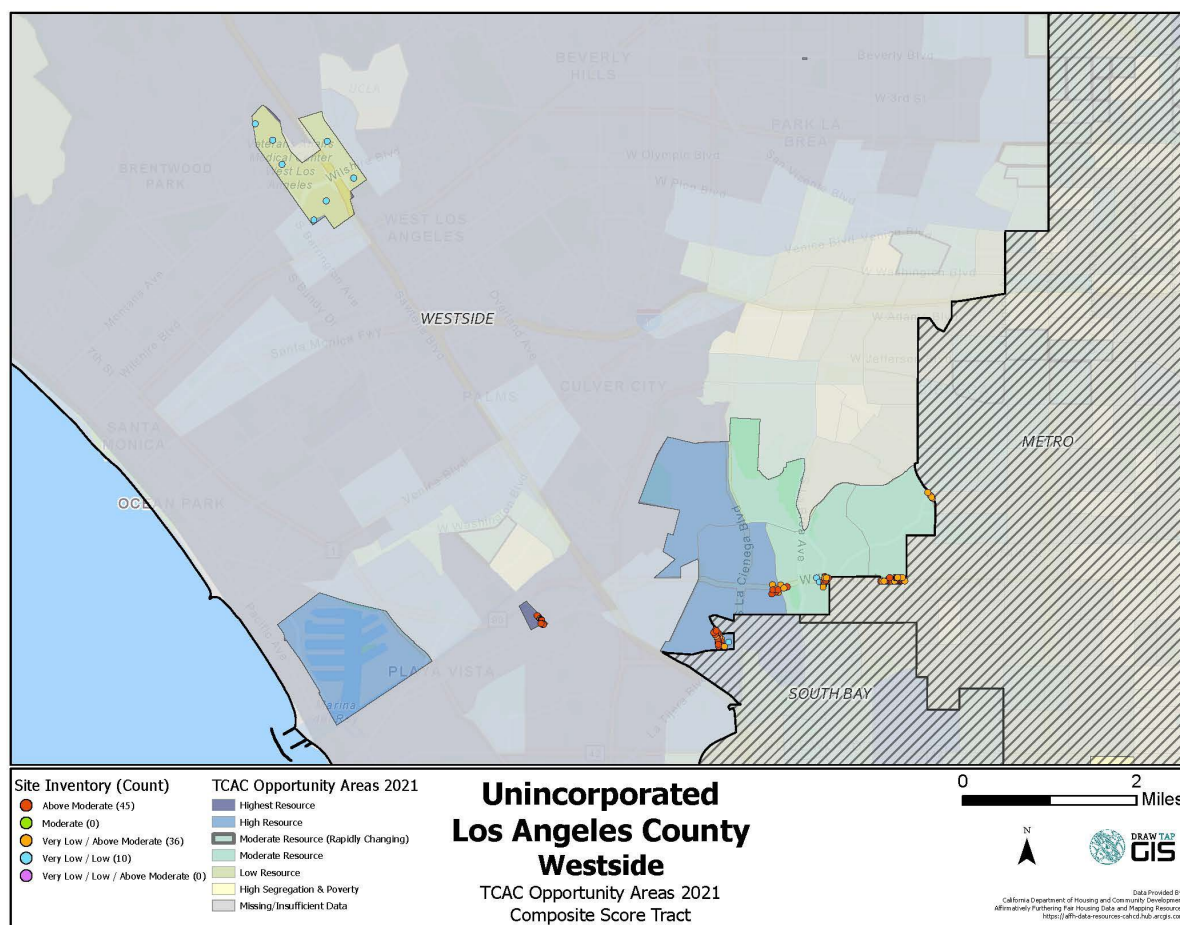


Figure E-30: Sites Inventory/Rezoning and TCAC Opportunity Map – Westside Planning Area



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

As shown in **Table E-4**, only six census tracts in the unincorporated areas are defined as R/ECAPs.¹⁰ Four R/ECAPs are located in the Metro Planning Area, one in the South Bay Planning Area, and one in the Westside Planning Area. **Figure E-31** shows the location of sites used to meet the lower income RHNA and unincorporated Los Angeles County R/ECAPs. As discussed previously, R/ECAPs are located in unincorporated Los Angeles County communities of West Athens-Westmont (two R/ECAPs), Florence-Firestone, Lennox, Willowbrook, and Sawtelle VA Center.

Table E-15 presents this distribution of units used to meet the County's 2021-2029 RHNA by R/ECAP designation and Planning Area. Approximately 7.2 percent of lower income RHNA units are located in a R/ECAP, including 8.7 percent of lower income units in the Metro Planning Area, 6.7 percent of lower income units in the South Bay Planning Area, and 29.7 percent of lower income units in the Westside Planning Area. A smaller proportion of moderate income units (3.1 percent) are in R/ECAP tracts compared to lower income units. There are 2.2 percent of above moderate income RHNA units in R/ECAP tracts. Although a larger proportion of lower income units are located within R/ECAP communities compared to moderate and above moderate income units, a majority of all RHNA units, regardless of income level, are not in R/ECAP tracts. RHNA sites strategies and R/ECAPs in the Metro, South Bay, and Westside Planning Areas are detailed below.

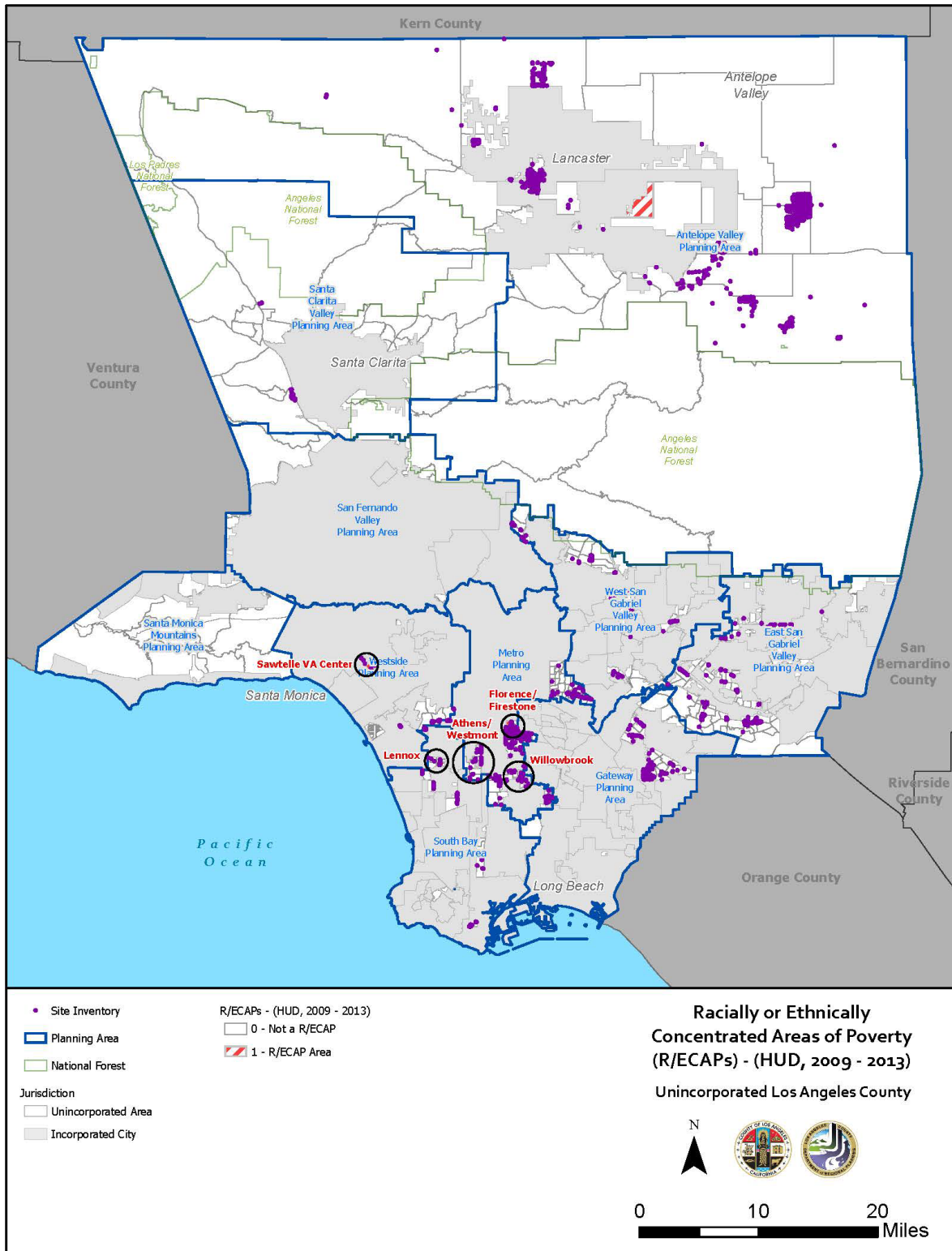
Table E-15: Distribution of RHNA Units (Sites Inventory and Rezoning) by R/ECAP Designation

Planning Area	Not a R/ECAP		R/ECAP Area		Total Units
Lower Income RHNA Units					
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	100.0%	7,092	0.0%	0	7,092
Gateway	100.0%	1,420	0.0%	0	1,420
Metro	91.3%	10,724	8.7%	1,018	11,742
Santa Clarita Valley	100.0%	1,179	0.0%	0	1,179
South Bay	93.3%	2,756	6.7%	198	2,954
West San Gabriel Valley	100.0%	3,244	0.0%	0	3,244
Westside	70.3%	2,438	29.7%	1,032	3,470
Total	92.8%	28,853	7.2%	2,248	31,101
Moderate Income RHNA Units					
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
Antelope Valley	100.0%	1,279	0.0%	0	1,279
Metro	96.5%	9,054	3.5%	330	9,384
Total	96.9%	10,333	3.1%	330	10,663
Above Moderate Income RHNA Units					
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA

¹⁰ There is one census tract near Lancaster that is also considered an R/ECAP. However, the majority of that tract falls with the boundaries of the City of Lancaster.

Planning Area	Not a R/ECAP		R/ECAP Area		Total Units
East San Gabriel Valley	100.0%	4,172	0.0%	0	4,172
Gateway	100.0%	5,251	0.0%	0	5,251
Metro	96.0%	6,051	4.0%	249	6,300
South Bay	91.6%	3,482	8.4%	319	3,801
West San Gabriel Valley	100.0%	4,235	0.0%	0	4,235
Westside	100.0%	2,534	0.0%	0	2,534
Total	97.8%	25,725	2.2%	568	26,293

Figure E-31: Distribution of RHNA Units (Sites Inventory and Rezoning) by R/ECAP Designation



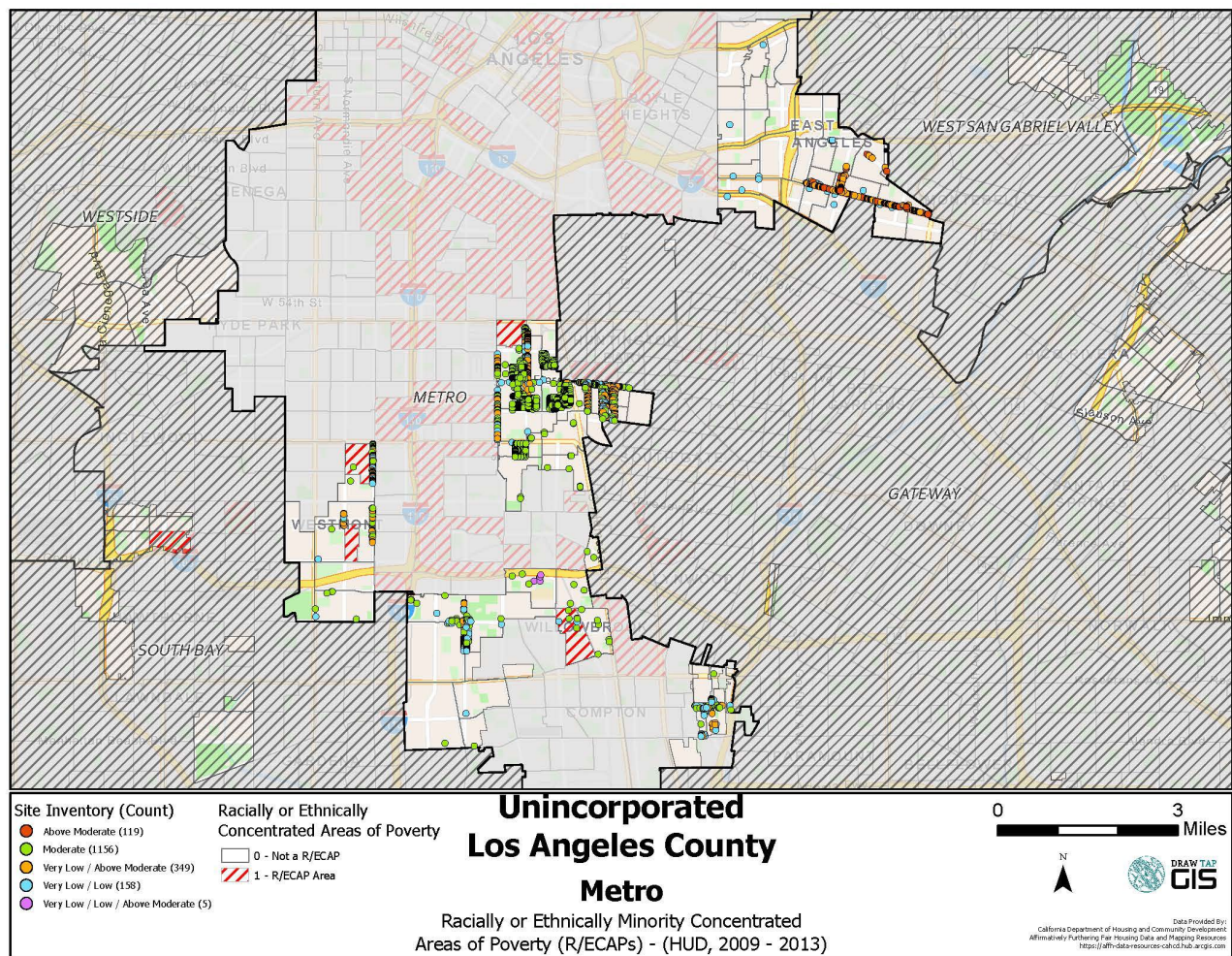
Metro Planning Area

Sites selected to meet the 2021-2029 RHNA and R/ECAPs in the Metro Planning Area are shown in **Figure E-32**. There are four R/ECAPs in the Metro Planning Area, in the unincorporated communities of West Athens-Westmont (two R/ECAPs), Florence-Firestone, and Willowbrook. All R/ECAPs are in the southern Metro Planning Area. Approximately 5.8 percent of RHNA units in the Metro Planning Area are in R/ECAPs, including 8.7 percent of lower income units and 3.5 percent of moderate income units (**Table E-16**).

Table E-16: Sites Inventory/Rezoning and R/ECAPs – Metro Planning Area

RHNA Units	Total Units	Units in R/ECAP	Percent in R/ECAP
Lower Income	11,742	1,018	8.7%
Moderate Income	9,384	330	3.5%
Above Moderate Income	6,300	249	4.0%
Total	27,426	1,597	5.8%

Figure E-32: Sites Inventory/Rezoning and R/ECAPs – Metro Planning Area



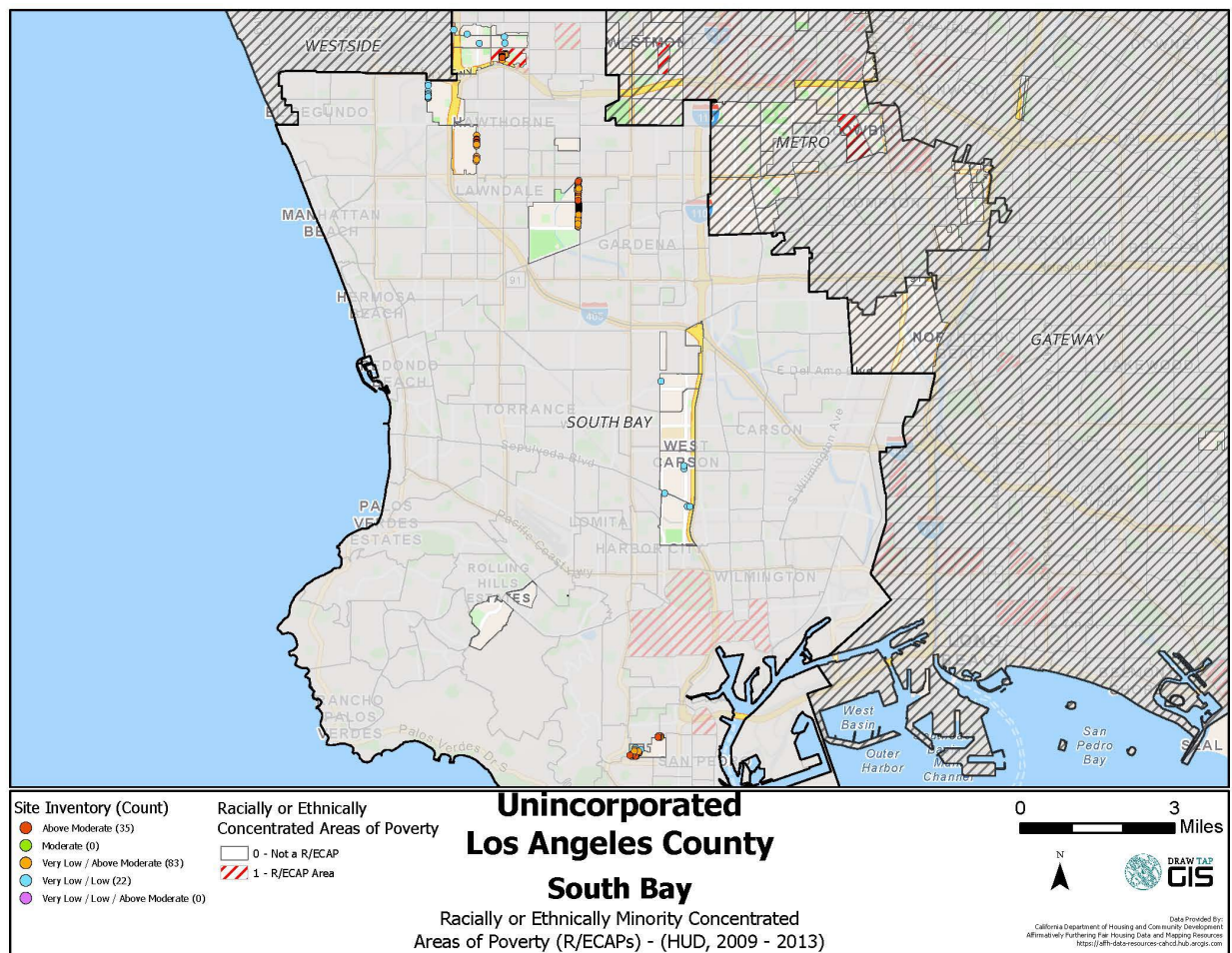
South Bay Planning Area

Sites selected to meet the 2021-2029 RHNA and R/ECAPs in the South Bay Planning Area are shown in **Figure E-33**. There is one R/ECAP the South Bay Planning Area in the unincorporated community of Lennox. The R/ECAP is in the northern portion of the South Bay Planning Area adjacent to the Westside and Metro Planning Areas. Approximately 7.7 percent of RHNA units in the South Bay Planning Area are in the R/ECAP, including 6.7 percent of lower income units (**Table E-17**).

Table E-17: Sites Inventory/Rezoning and R/ECAPs – South Bay Planning Area

RHNA Units	Total Units	Units in R/ECAP	Percent in R/ECAP
Lower Income	2,954	198	6.7%
Above Moderate Income	3,801	319	8.4%
Total	6,755	517	7.7%

Figure E-33: Sites Inventory/Rezoning and R/ECAPs – South Bay Planning Area



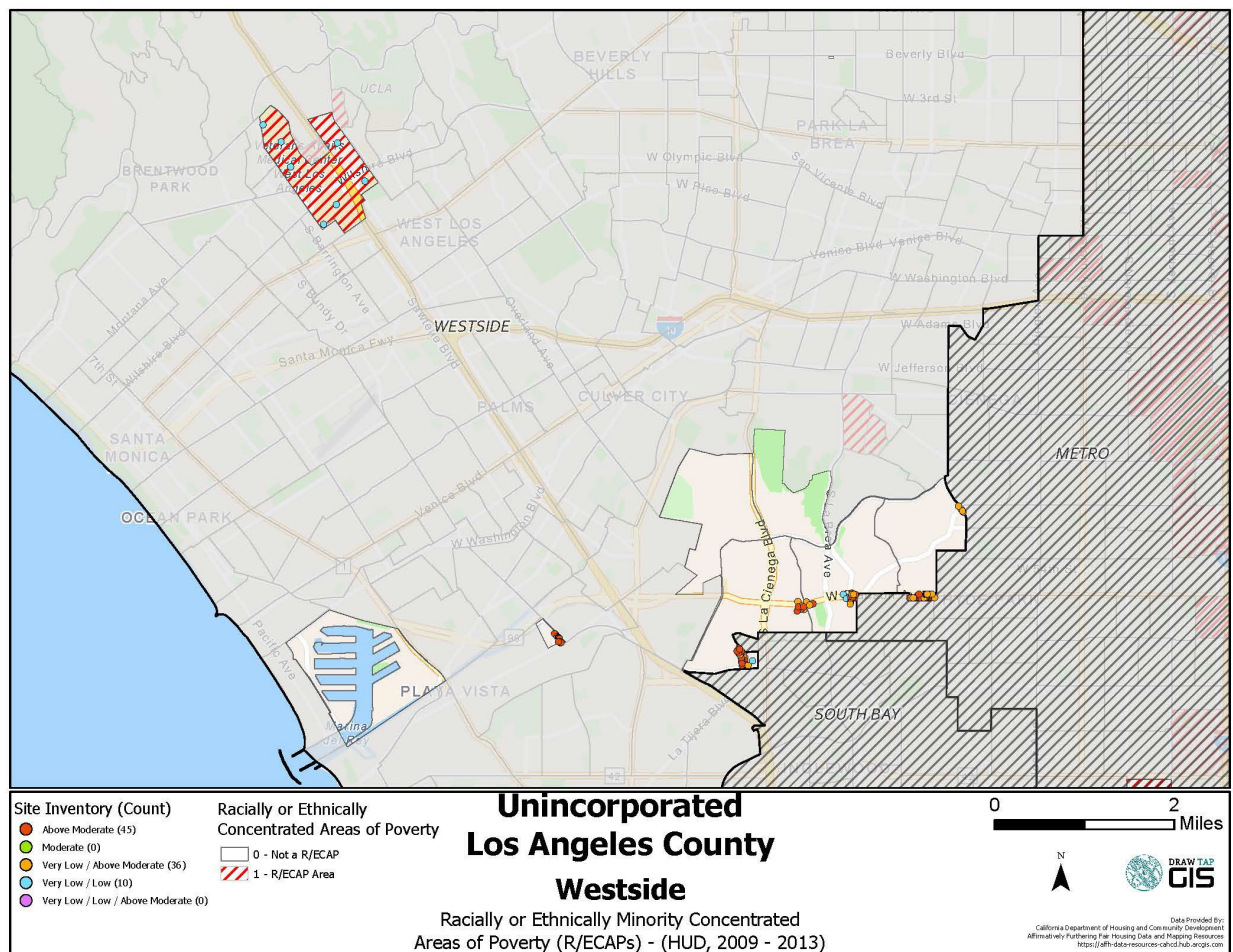
Westside Planning Area

Sites selected to meet the 2021-2029 RHNA and R/ECAPs in the Westside Planning Area are shown in **Figure E-34**. There is one R/ECAP in the Westside Planning Area in the unincorporated community of West Los Angeles/Sawtelle VA Center. The R/ECAP is in the central portion of the Westside Planning Area. Approximately 17 percent of RHNA units in the Westside Planning Area are in the R/ECAP, including 29.7 percent of lower income units. There are no above moderate income units in the R/ECAP (**Table E-18**).

Table E-18: Sites Inventory/Rezoning and R/ECAPs – Westside Planning Area

RHNA Units	Total Units	Units in R/ECAP	Percent in R/ECAP
Lower Income	3,470	1,032	29.7%
Above Moderate Income	2,534	0	0.0%
Total	6,004	1,032	17.2%

Figure E-34: Sites Inventory/Rezoning and R/ECAPs – Westside Planning Area



Low and Moderate Income Area¹¹

By nature of the objective criteria for selecting nonvacant sites with potential for redevelopment over the next eight years, the RHNA sites in the Sites Inventory and the Rezoning Program are more likely to be located in areas with higher rates of marginally operating uses or underutilized properties. These are generally lower-cost areas with low and moderate income households. The distribution of sites by Low and Moderate Income (LMI) population and Planning Area is presented in **Figure E-35** and **Table E-19**.

Overall, about 68 percent of the RHNA units are located in Low and Moderate Income Areas, including 63.5 percent of lower income units, 89.6 percent of moderate income units, and 63.4 percent of above moderate income units. The Metro, (91.6 percent), Gateway (79.1 percent), South Bay (73.9 percent), and Antelope Valley (70.6 percent) Planning Areas have the highest concentration of RHNA units in LMI areas. Although a majority of lower income units are in LMI areas, where more than 50 percent of the population is low or moderate income, sites selected for lower income units are not disproportionately located in low income areas in comparison to moderate and above moderate income sites. As shown in **Figure E-35**, much of unincorporated Los Angeles County has higher concentrations of LMI households.

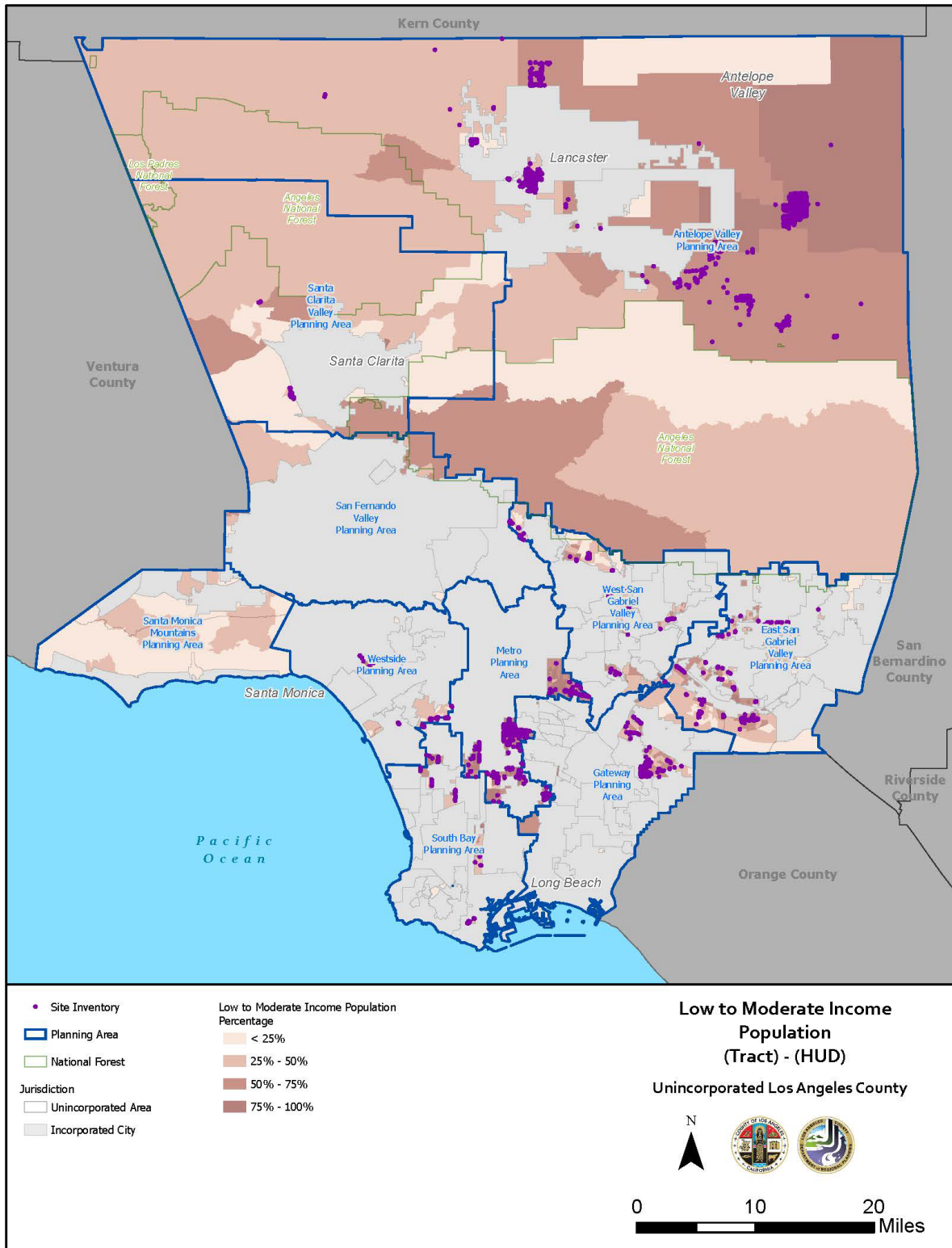
Table E-19: Distribution of RHNA Units (Sites Inventory and Rezoning) by HUD Low/Moderate Income Area

Planning Area	HUD Low to Moderate Income Population Percentage								Total Units
	<25%	25-50%		50-75%		75-100%			
Lower Income RHNA Units									
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	3.4%	244	31.3%	2,221	55.4%	3,930	9.8%	697	7,092
Gateway	5.4%	77	40.8%	579	36.1%	512	17.7%	252	1,420
Metro	0.0%	0	12.2%	1,437	30.3%	3,554	57.5%	6,751	11,742
Santa Clarita Valley	16.6%	196	73.5%	867	9.8%	116	0.0%	0	1,179
South Bay	0.0%	0	27.4%	808	64.6%	1,909	8.0%	237	2,954
West San Gabriel Valley	6.5%	211	72.6%	2,355	18.9%	614	2.0%	64	3,244
Westside	1.3%	45	66.6%	2,311	2.4%	82	29.7%	1,032	3,470
Total	2.5%	773	34.0%	10,578	34.5%	10,717	29.0%	9,033	31,101
Moderate Income RHNA Units									
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
Antelope Valley	22.0%	282	7.3%	94	30.3%	388	40.3%	515	1,279
Metro	0.0%	0	7.8%	736	28.1%	2,639	64.0%	6,009	9,384
Total	2.6%	282	7.8%	830	28.4%	3,027	61.2%	6,524	10,663
Above Moderate Income RHNA Units									
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA

¹¹ Low and Moderate Income Area per HUD definition – where more than 51 percent of the population earns no more than 80 percent of the Area Median Income.

Planning Area	HUD Low to Moderate Income Population Percentage								Total Units
	<25%		25-50%		50-75%		75-100%		
East San Gabriel Valley	9.5%	395	41.2%	1,720	49.3%	2,057	0.0%	0	4,172
Gateway	0.0%	0	14.0%	735	38.5%	2,020	47.5%	2,496	5,251
Metro	0.0%	0	2.0%	125	44.5%	2,806	53.5%	3,369	6,300
South Bay	0.0%	0	25.1%	955	52.4%	1,990	22.5%	856	3,801
West San Gabriel Valley	6.8%	290	71.4%	3,023	19.3%	819	2.4%	103	4,235
Westside	4.5%	114	89.5%	2,268	6.0%	152	0.0%	0	2,534
Total	3.0%	799	33.6%	8,826	37.4%	9,844	26.0%	6,824	26,293

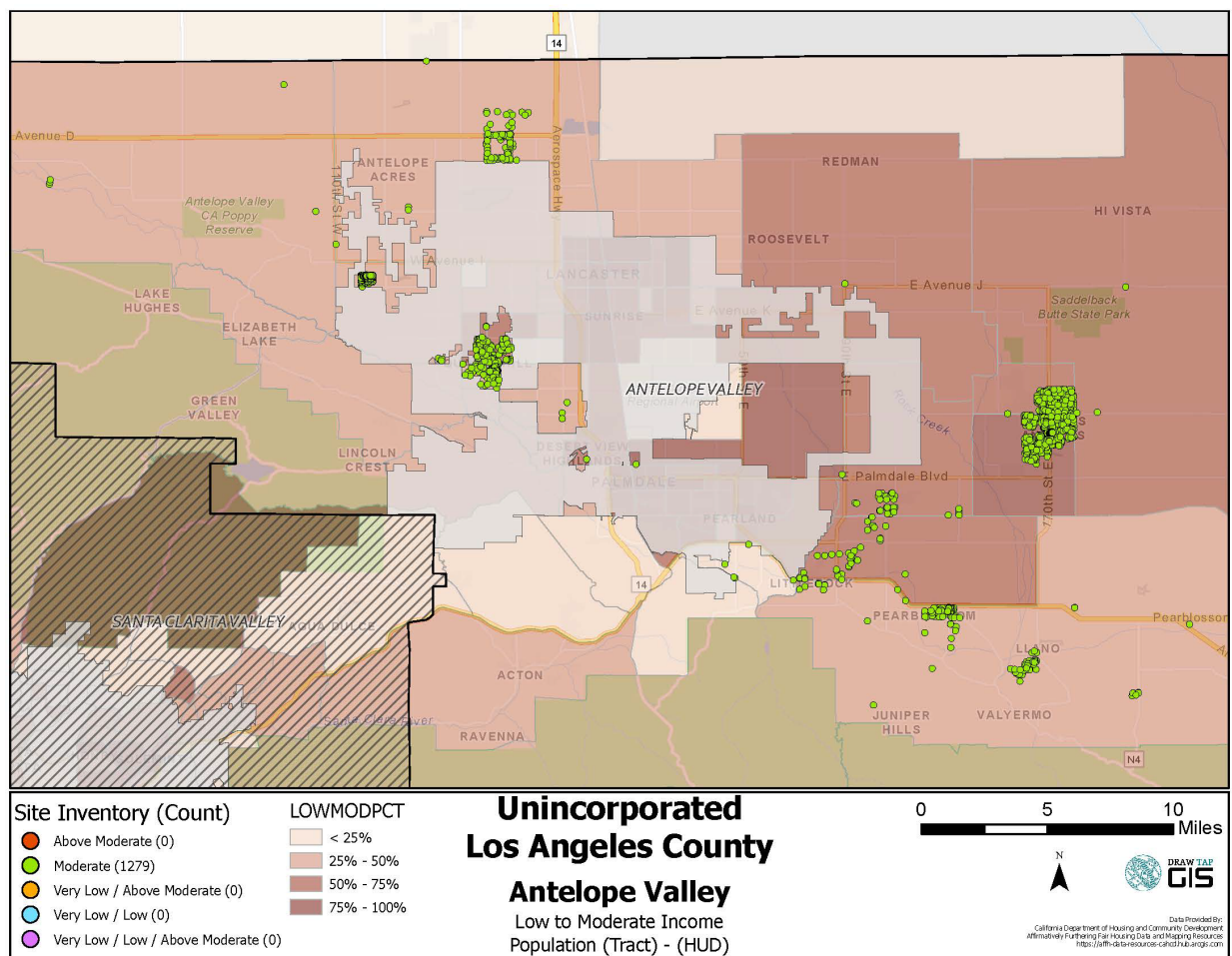
Figure E-35: Distribution of RHNA Units (Sites Inventory and Rezoning) by HUD Low/Moderate Income Area



Antelope Valley Planning Area

Sites in the Sites Inventory and the Rezoning Program and the HUD LMI Areas in the Antelope Valley Planning Area are shown in **Figure E-36**. In general, the eastern side of the Planning Area has greater concentrations of LMI households than the western side. As discussed previously, most of northeastern corner of the Antelope Valley Planning Area is also categorized as low resource by the Fair Housing Task Force. All units in the Antelope Valley Planning Area are moderate income units. Of the 1,279 moderate income RHNA units, 30.3 percent are in tracts with LMI populations between 50 and 75 percent, and 40.3 percent are in tracts with LMI populations exceeding 75 percent.

Figure E-36: Sites Inventory/Rezoning and LMI Areas – Antelope Valley Planning Area



Gateway Planning Area

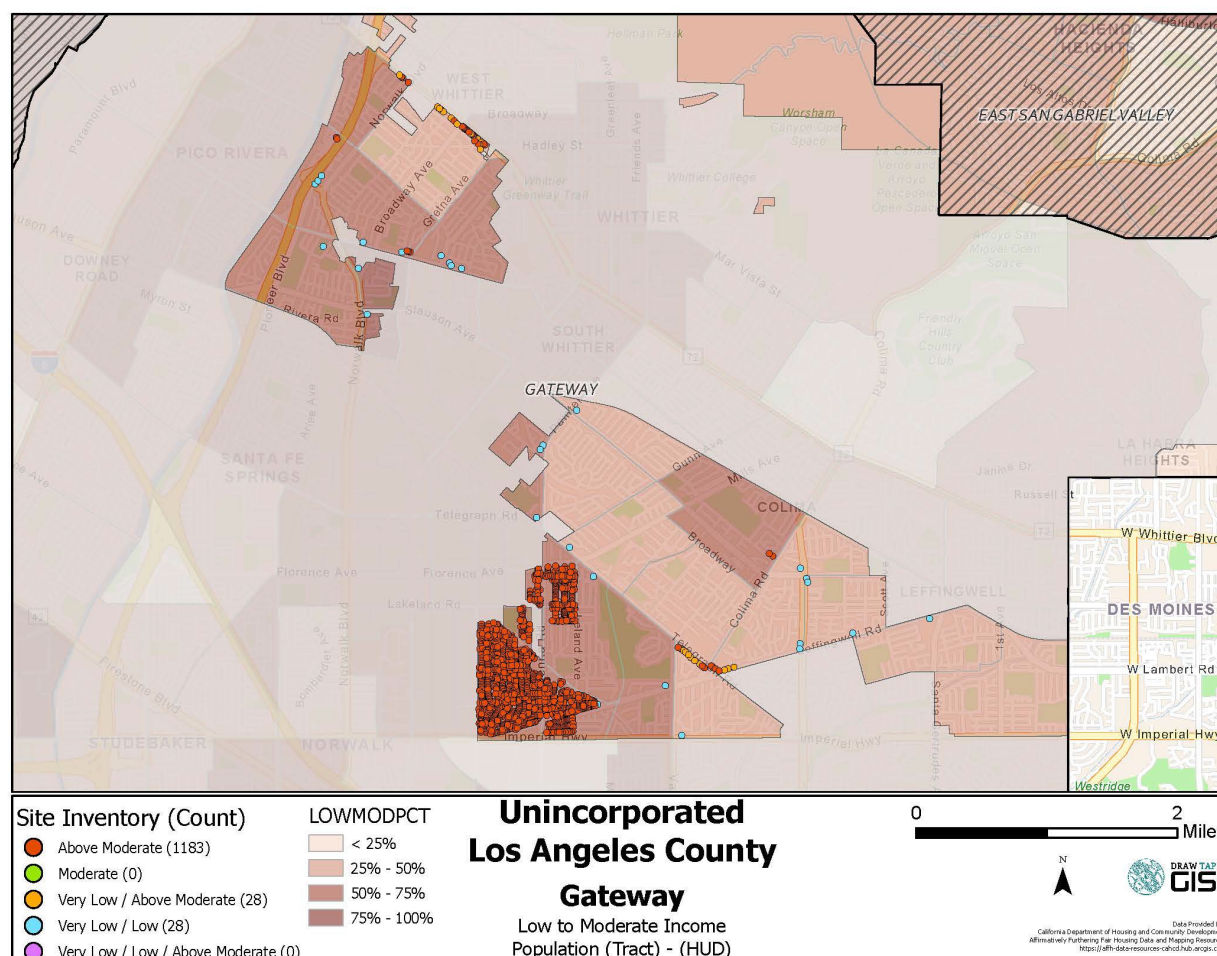
Sites in the Sites Inventory and the Rezoning Program and the HUD LMI Areas in the Gateway Planning Area are shown in **Figure E-37**. LMI populations in the Gateway Planning Area are most concentrated in the northeastern corner where sites have been identified to meet the RHNA. Lower and above moderate income units have been identified in the Gateway Planning Area to meet the RHNA.

Approximately 41 percent of units are in tracts where 75 to 100 percent of the population is LMI, including 17.7 percent of lower income units and 47.5 percent of above moderate units (**Table E-20**).

Table E-20: Sites Inventory/Rezoning and LMI Areas – Gateway Planning Area

RHNA Units	HUD Low to Moderate Income Population Percentage				Total Units
	<25%	25-50%	50-75%	75-100%	
Lower Income	5.4%	40.8%	36.1%	17.7%	1,420
Above Moderate Income	0%	14.0%	38.5%	47.5%	5,251
Total	1.2%	19.7%	38.0%	41.2%	6,671

Figure E-37: Sites Inventory/Rezoning and LMI Areas – Gateway Planning Area



Metro Planning Area

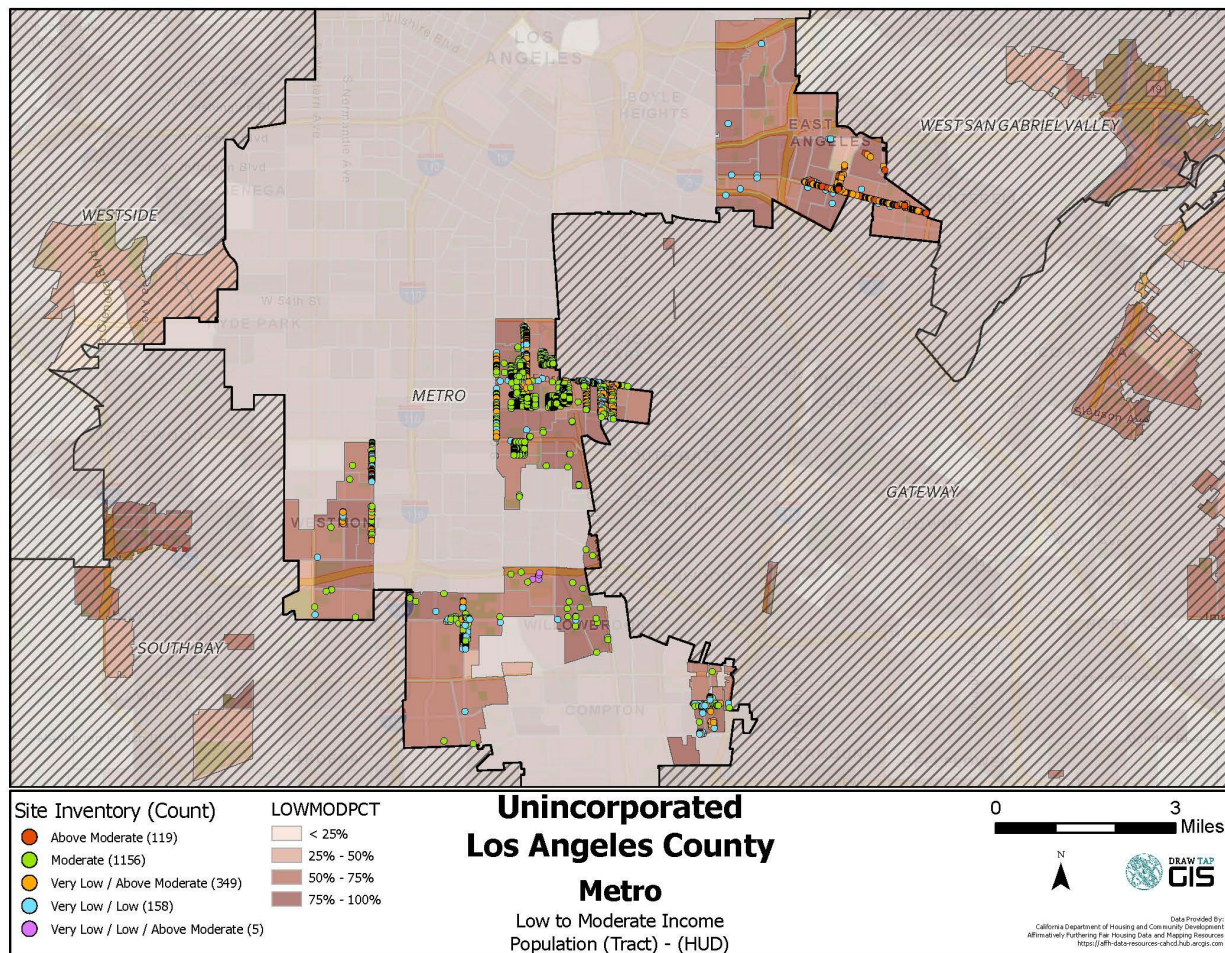
Sites in the Sites Inventory and the Rezoning Program and the HUD LMI Areas in the Metro Planning Area are shown in **Figure E-38**. Most unincorporated areas in the Metro Planning Area have concentrations of LMI households. Lower, moderate, and above moderate income units have been identified in the Metro Planning Area to meet the RHNA. Approximately 58.8 percent of units are in

tracts where 75 to 100 percent of the population is LMI, including 57.5 percent of lower income units, 65 percent of moderate income units, and 53.5 percent of above moderate units (**Table E-21**).

Table E-21: Sites Inventory/Rezoning and LMI Areas – Metro Planning Area

RHNA Units	HUD Low to Moderate Income Population Percentage				Total Units
	<25%	25-50%	50-75%	75-100%	
Lower Income	0.0%	12.2%	30.3%	57.5%	11,742
Moderate	0.0%	7.8%	28.1%	64.0%	9,384
Above Moderate Income	0.0%	2.0%	44.5%	53.5%	6,300
Total	0.0%	8.5%	32.8%	58.8%	27,426

Figure E-38: Sites Inventory/Rezoning and LMI Areas – Metro Planning Area



South Bay Planning Area

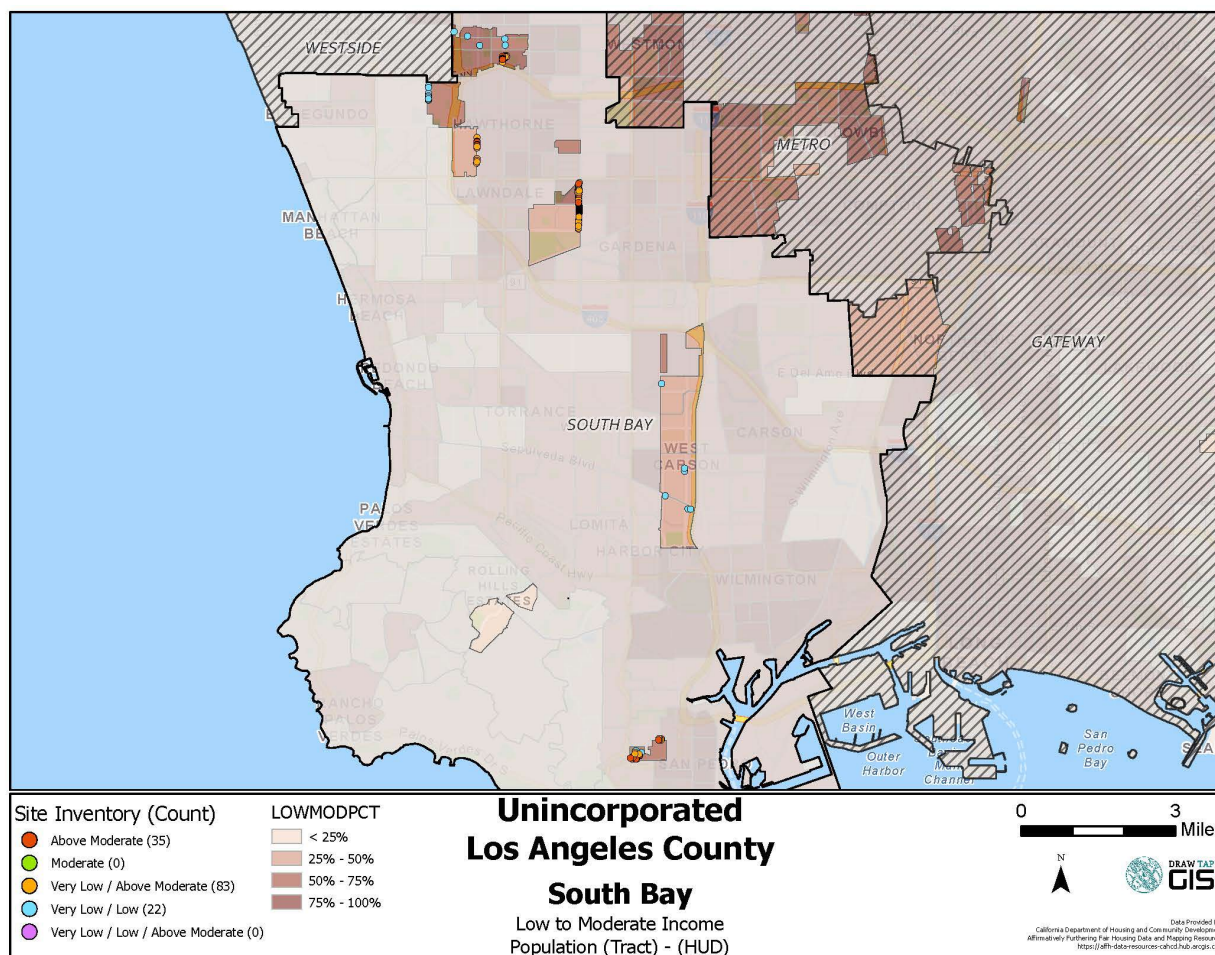
Sites in the Sites Inventory and the Rezoning Program and the HUD LMI Areas in the South Bay Planning Area are shown in **Figure E-39**. Northern unincorporated areas in the South Bay Planning Area generally

have higher concentrations of LMI households. Lower and above moderate income units have been identified in the South Bay Planning Area to meet the RHNA. Approximately 16.2 percent of units are in tracts where 75 to 100 percent of the population is LMI and 57.7 percent are in tracts where 50 to 75 percent of the population is LMI (**Table E-22**).

Table E-22: Sites Inventory/Rezoning and LMI Areas – South Bay Planning Area

RHNA Units	HUD Low to Moderate Income Population Percentage				Total Units
	<25%	25-50%	50-75%	75-100%	
Lower Income	0.0%	27.4%	64.6%	8.0%	2,954
Above Moderate Income	0.0%	25.1%	52.4%	22.5%	3,801
Total	0.0%	26.1%	57.7%	16.2%	6,755

Figure E-39: Sites Inventory/Rezoning and LMI Areas – South Bay Planning Area



Environmental Health (CalEnviroScreen Score)

CalEnviroScreen 4.0 scores percentiles based on exposures (i.e., ozone, toxic releases, traffic, etc.), environmental effects (i.e., cleanup sites), sensitive populations, and socioeconomic factors. Lower scores indicate better environmental health. Tracts in the 80th percentile, for example, are exposed to worse environmental conditions than 80 percent of tracts in the region. The distribution of RHNA units by CalEnviroScreen score is shown in **Table E-23** and **Figure E-40**.

Overall, nearly half of the RHNA units are located in tracts in the 81st percentile or higher. A smaller proportion of lower income units are located in these tracts (43.9 percent) compared to 88 percent of moderate income units. Approximately 12.4 percent of units scored are in tracts in the 40th percentile or lower, including 15.7 percent of lower income units, 6.2 percent of moderate income units, and 11.1 percent of above moderate income units.

The Gateway, Metro, and South Bay Planning Areas have the highest concentration of RHNA units in the 81st percentile or higher (see **Figures E-41, E-42, and E-43**). Approximately 64.7 percent of units in the Gateway Planning Area, 87 percent of units in the Metro Planning Area, and 45.8 percent of units in the South Bay Planning Area are in the 81st percentile or higher. In comparison, only 12.9 percent of units in the East San Gabriel Valley Planning Area, 3.7 percent of units in the West San Gabriel Planning Area, and 0.2 percent of units in the Antelope Valley Planning Area scored in the same range. There are no units in Westside or Santa Clarita Valley Planning Areas in tracts in the 81st percentile or above.

Table E-23: Distribution of RHNA Units (Sites Inventory and Rezoning) by Environmental Health

Planning Area	CalEnviroScreen Percentile										Total Units
	<20%	20-40%		40-60%		60-80%		>80%			
Lower Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	0.2%	11	12.2%	866	33.2%	2,358	42.6%	3,020	11.8%	837	7,092
Gateway	0.0%	0	0.0%	0	6.8%	97	58.4%	829	34.8%	494	1,420
Metro	0.0%	0	0.0%	0	0.0%	0	7.0%	824	93.0%	10,918	11,742
Santa Clarita Valley	0.0%	0	100.0 %	1,179	0.0%	0	0.0%	0	0.0%	0	1,179
South Bay	0.0%	0	0.0%	0	22.7%	670	34.2%	1,011	43.1%	1,273	2,954
West San Gabriel Valley	12.2%	395	42.0%	1,361	24.9%	809	17.1%	556	3.8%	123	3,244
Westside	29.7%	1,032	0.8%	28	61.3%	2,126	8.2%	284	0.0%	0	3,470
Total	4.6%	1,438	11.0%	3,434	19.5%	6,060	21.0%	6,524	43.9%	13,645	31,101
Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA

Planning Area	CalEnviroScreen Percentile										Total Units
	<20%		20-40%		40-60%		60-80%		>80%		
Antelope Valley	5.7%	73	45.7%	585	44.7%	572	3.6%	46	0.2%	3	1,279
Metro	0.0%	0	0.0%	0	0.0%	0	0.0%	0	100.0 %	9,384	9,384
Total	0.7%	73	5.5%	585	5.4%	572	0.4%	46	88.0%	9,387	10,663
Above Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	0.0%	0	23.7%	987	31.1%	1,298	30.4%	1,268	14.8%	619	4,172
Gateway	0.0%	0	0.0%	0	0.7%	36	26.5%	1,393	72.8%	3,822	5,251
Metro	0.0%	0	0.0%	0	0.0%	0	43.7%	2,756	56.3%	3,544	6,300
South Bay	0.0%	0	0.0%	0	29.0%	1,103	23.1%	878	47.9%	1,820	3,801
West San Gabriel Valley	27.2%	1,152	14.3%	605	46.4%	1,966	8.5%	358	3.6%	154	4,235
Westside	0.0%	0	7.3%	184	69.1%	1,751	23.6%	599	0.0%	0	2,534
Total	4.4%	1,152	6.8%	1,776	23.4%	6,154	27.6%	7,252	37.9%	9,959	26,293

Figure E-40: Distribution of RHNA Units (Sites Inventory and Rezoning) by Environmental Health

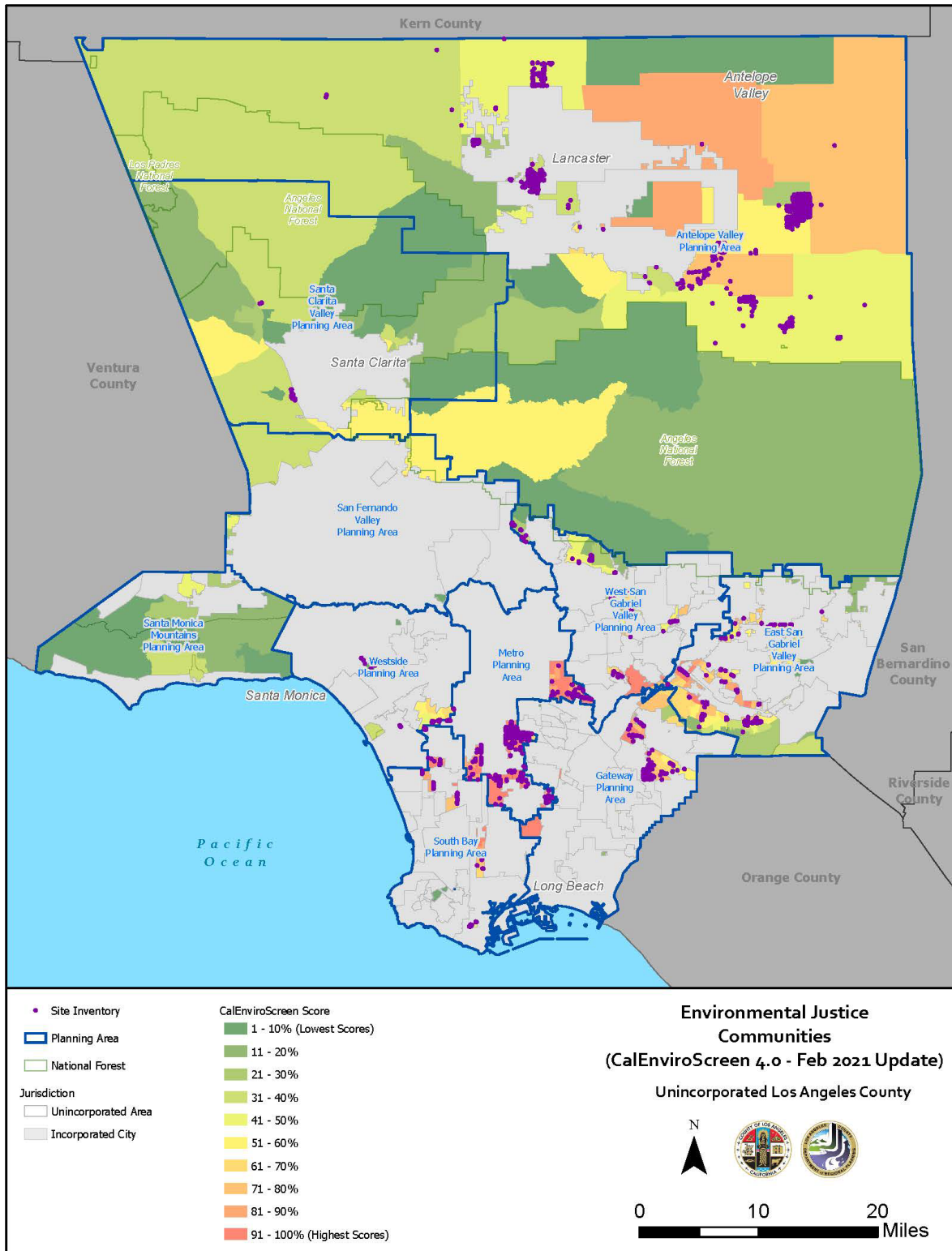


Figure E-41: Sites Inventory/Rezoning and CalEnviroScreen Percentile – Gateway Planning Area

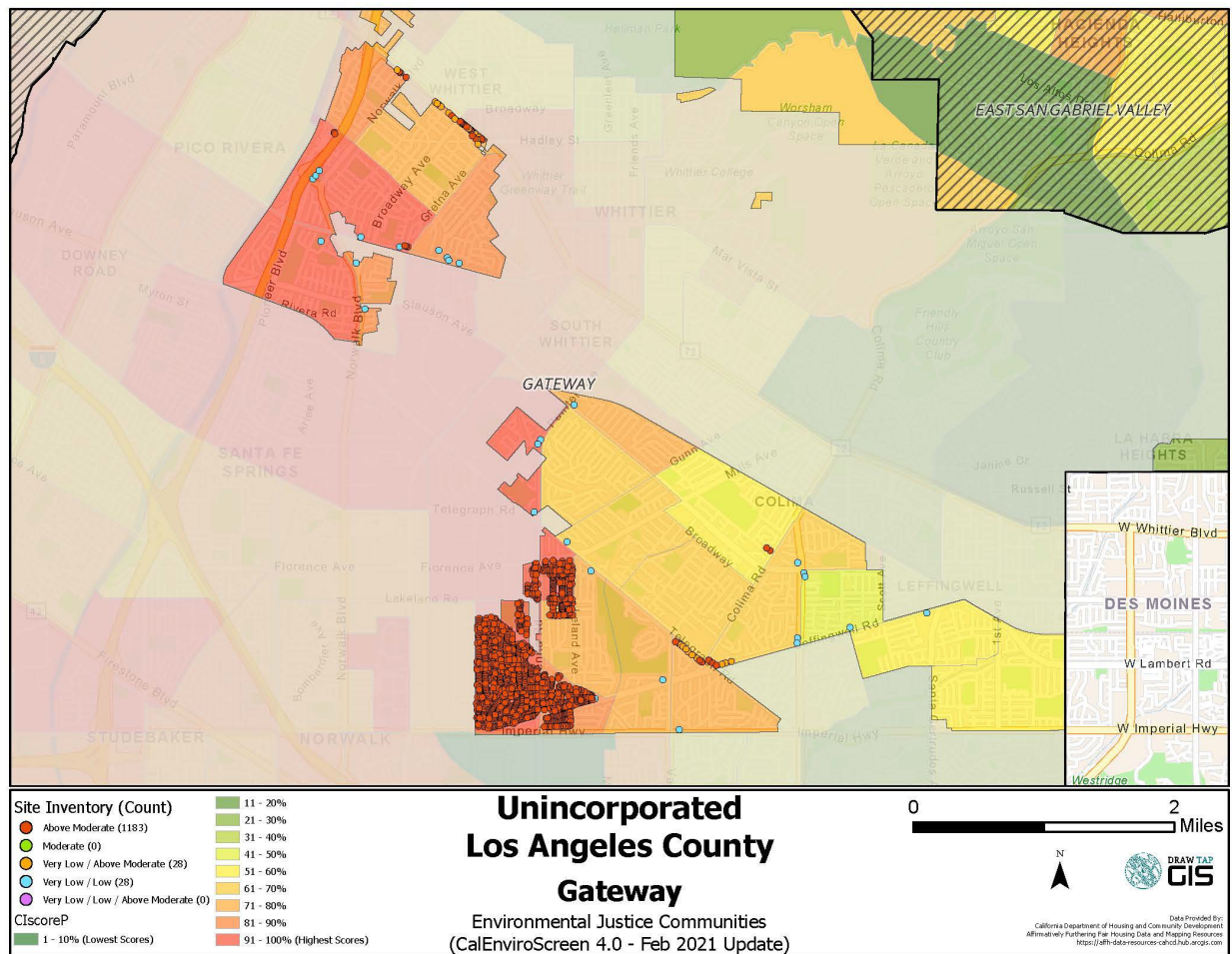


Figure E-42: Sites Inventory/Rezoning and CalEnviroScreen Percentile – Metro Planning Area

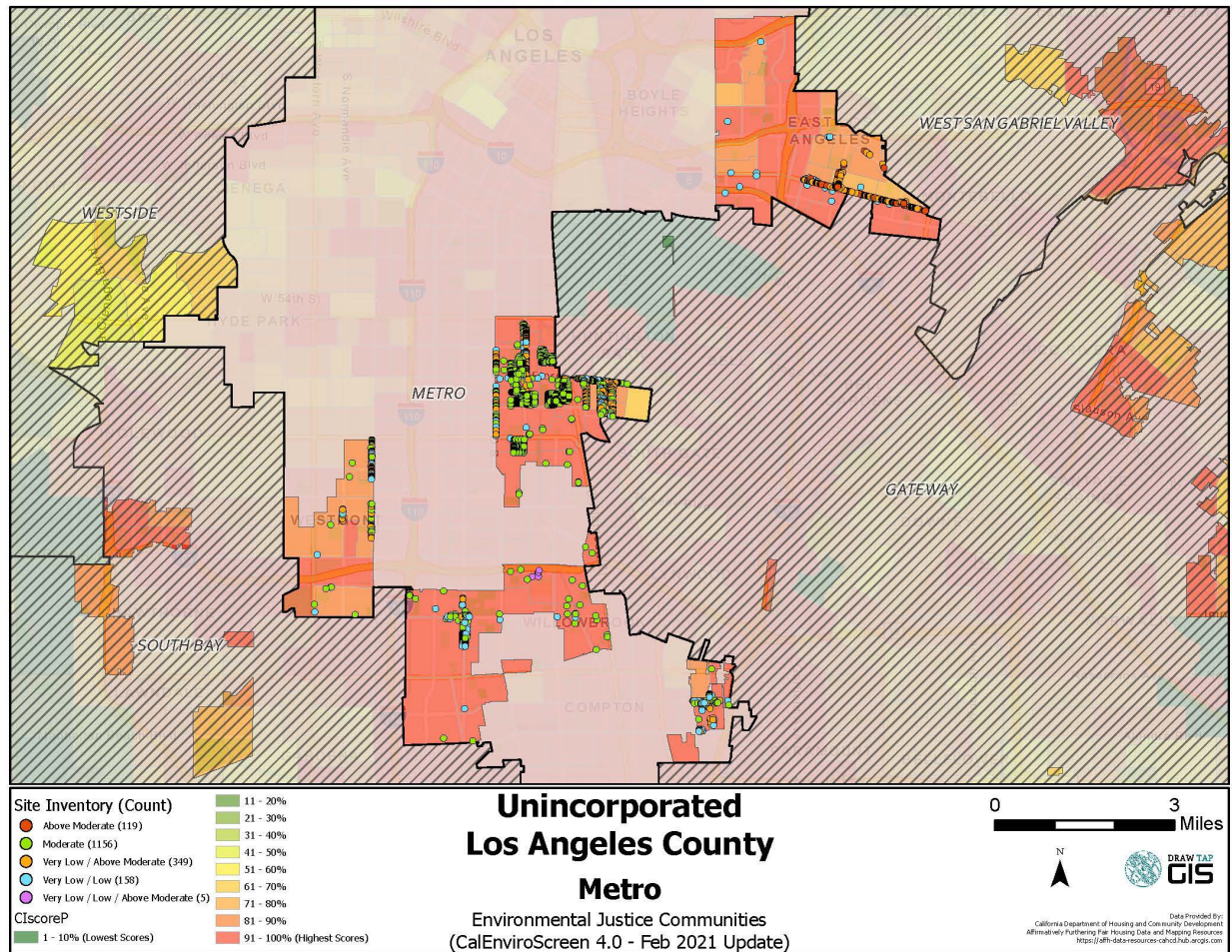
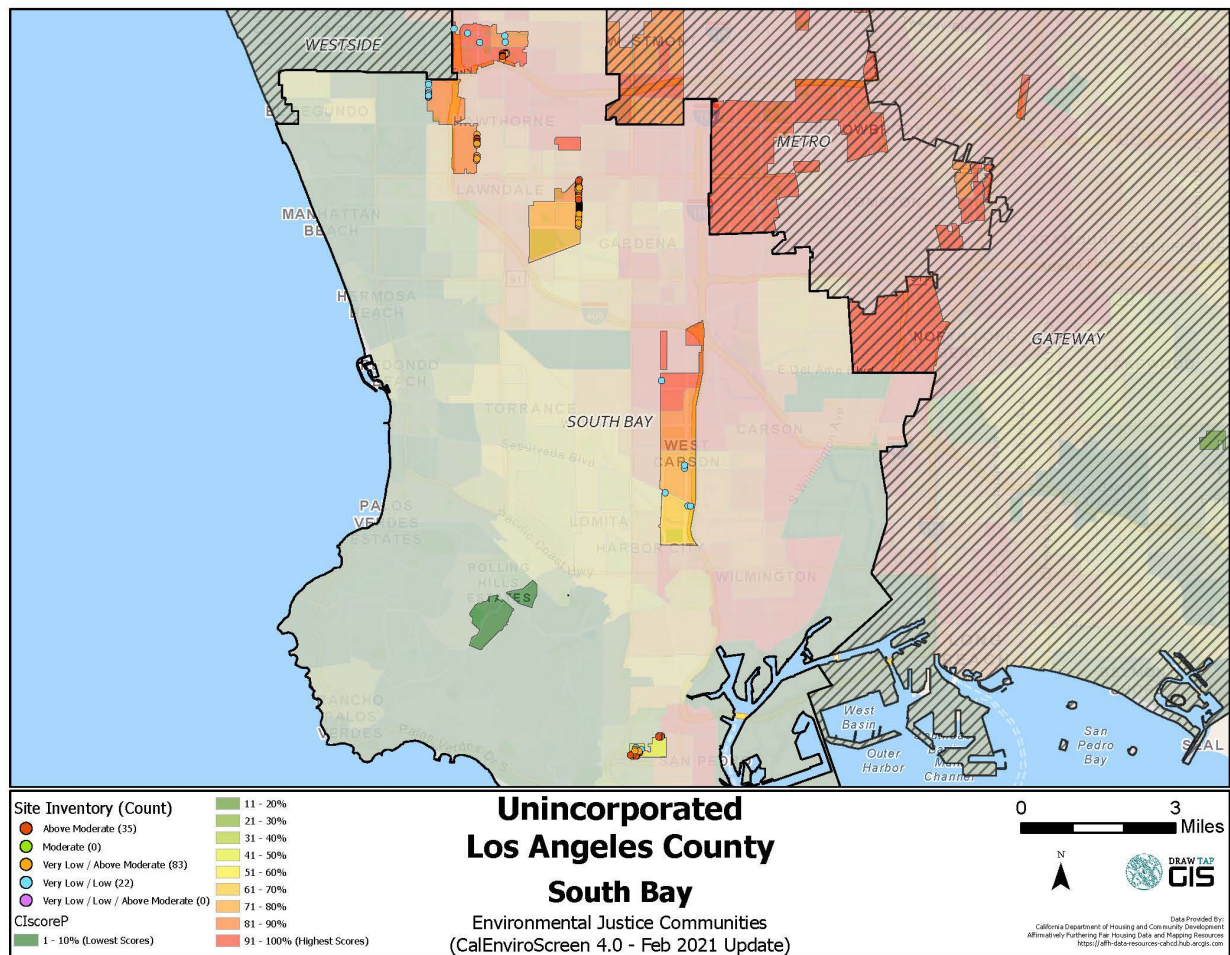


Figure E-43: Sites Inventory/Rezoning and CalEnviroScreen Percentile – South Bay Planning Area



Integration and Segregation/Disproportionate Needs

Concentration of People of Color

Concentrations of people of color are shown in **Figure E-2** and **Figure E-44**. As discussed previously, most of unincorporated Los Angeles County has high concentrations of racial/ethnic minority populations.

There are no RHNA units located in block groups where people of color make up less 20 percent of the population. A majority of RHNA units are in block groups where more than 80 percent of the population is people of color, including 72.5 percent of lower income units, 88.3 percent of moderate income units, and 69.5 percent of above moderate income units.

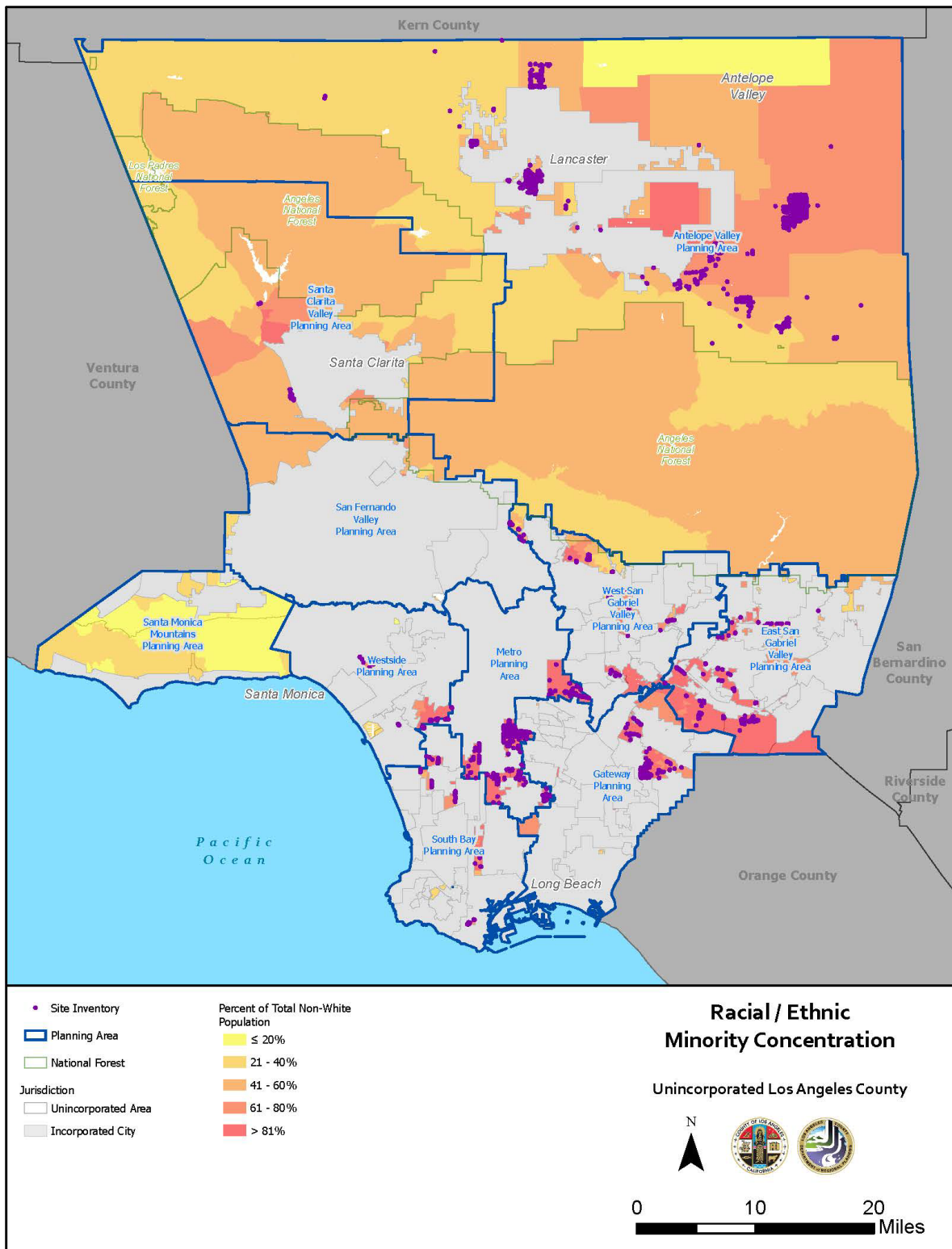
The Metro and East San Gabriel Valley Planning Areas have the highest numbers of lower income RHNA sites. These are areas with historically high concentrations of people of color. The Sites Inventory and concentration of people of color by Planning Areas are shown in **Table E-24**.

Table E-24: Distribution of RHNA Units (Sites Inventory and Rezoning) by Population, People of Color

Planning Area	Percent of POC in Block Groups										Total Units
	<20%	20-40%		40-60%		60-80%		>80%			
Lower Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	0.0%	0	0.0%	0	0.4%	30	26.6%	1,888	73.0%	5,174	7,092
Gateway	0.0%	0	0.0%	0	0.0%	0	9.9%	140	90.1%	1,280	1,420
Metro	0.0%	0	0.0%	0	0.0%	0	0.0%	0	100.0%	11,742	11,742
Santa Clarita Valley	0.0%	0	0.0%	0	90.2%	1,063	9.8%	116	0.0%	0	1,179
South Bay	0.0%	0	0.0%	0	0.0%	0	61.8%	1,827	38.2%	1,127	2,954
West San Gabriel Valley	0.0%	0	4.6%	148	22.1%	716	48.0%	1,558	25.3%	822	3,244
Westside	0.0%	0	0.0%	0	0.8%	28	29.7%	1,032	69.5%	2,410	3,470
Total	0.0%	0	0.5%	148	5.9%	1,837	21.1%	6,561	72.5%	22,555	31,101
Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
Antelope Valley	0.0%	0	10.7%	137	41.5%	531	45.5%	582	2.3%	29	1,279
Metro	0.0%	0	0.0%	0	0.0%	0	0.0%	0	100.0%	9,384	9,384

Planning Area	Percent of POC in Block Groups										Total Units
	<20%		20-40%		40-60%		60-80%		>80%		
Total	0.0%	0	1.3%	137	5.0%	531	5.5%	582	88.3%	9,413	10,663
Above Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	0.0%	0	0.0%	0	0.0%	0	46.5%	1,941	53.5%	2,231	4,172
Gateway	0.0%	0	0.0%	0	0.0%	0	0.0%	0	100.0%	5,251	5,251
Metro	0.0%	0	0.0%	0	0.0%	0	0.0%	0	100.0%	6,300	6,300
South Bay	0.0%	0	0.0%	0	0.0%	0	58.1%	2,208	41.9%	1,593	3,801
West San Gabriel Valley	0.0%	0	5.3%	226	23.3%	987	58.6%	2,480	12.8%	542	4,235
Westside	0.0%	0	0.0%	0	7.3%	184	0.0%	0	92.7%	2,350	2,534
Total	0.0%	0	0.9%	226	4.5%	1,171	25.2%	6,629	69.5%	18,267	26,293

Figure E-44: Distribution of RHNA Units (Sites Inventory and Rezoning) by Population, People of Color



May 17, 2022

Figure E-45: Sites Inventory/Rezoning and Concentration of People of Color – Antelope Valley Planning Area

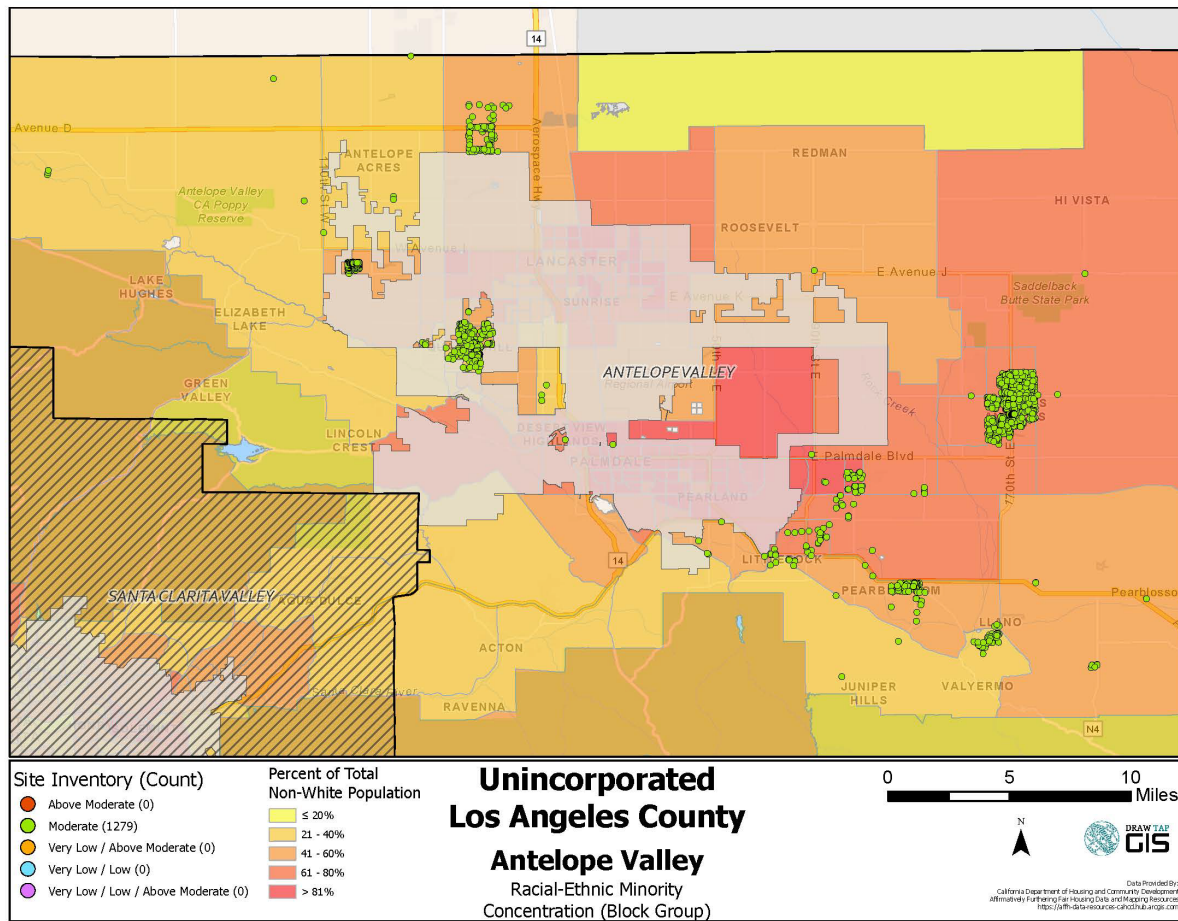


Figure E-46: Sites Inventory/Rezoning and Concentration of People of Color – East San Gabriel Valley Planning Area

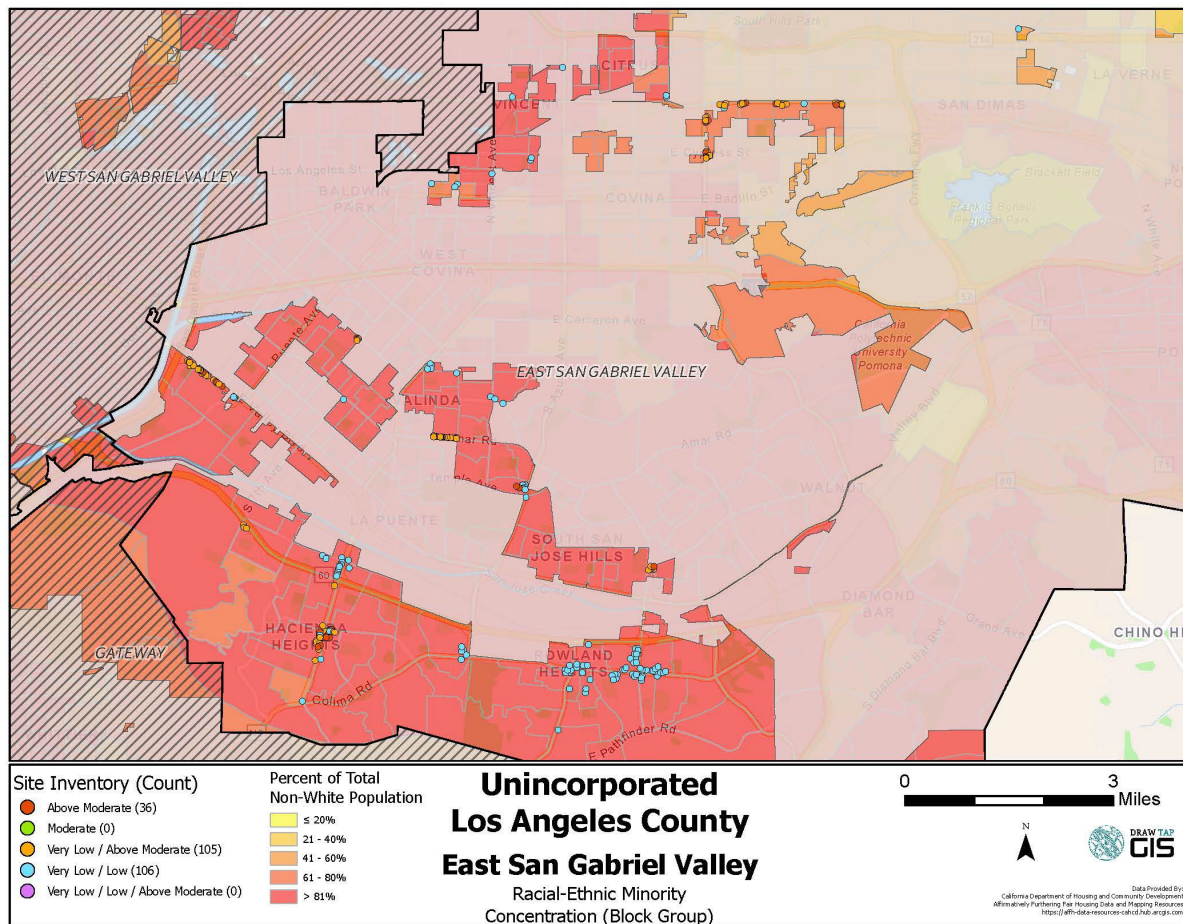


Figure E-47: Sites Inventory/Rezoning and Concentration of People of Color – Gateway Planning Area

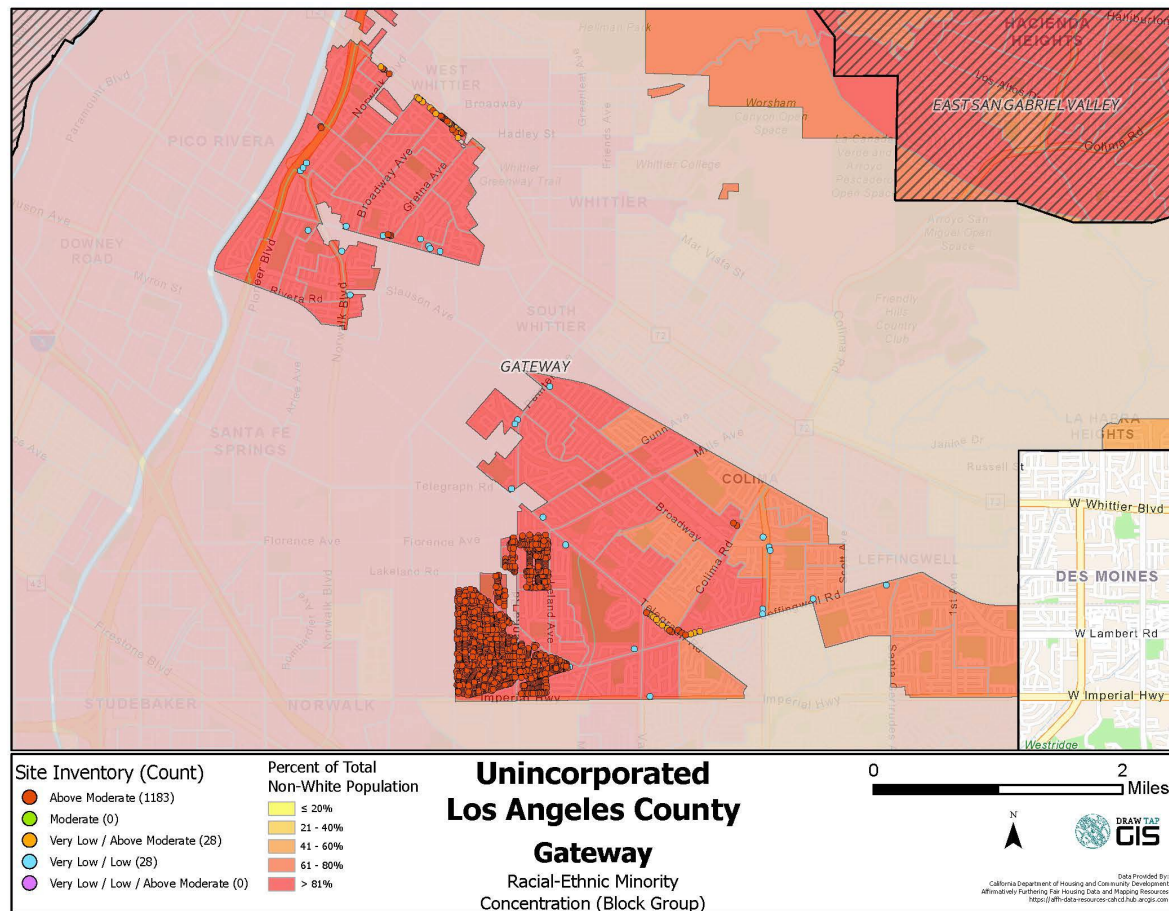


Figure E-48: Sites Inventory/Rezoning and Concentration of People of Color – Metro Planning Area

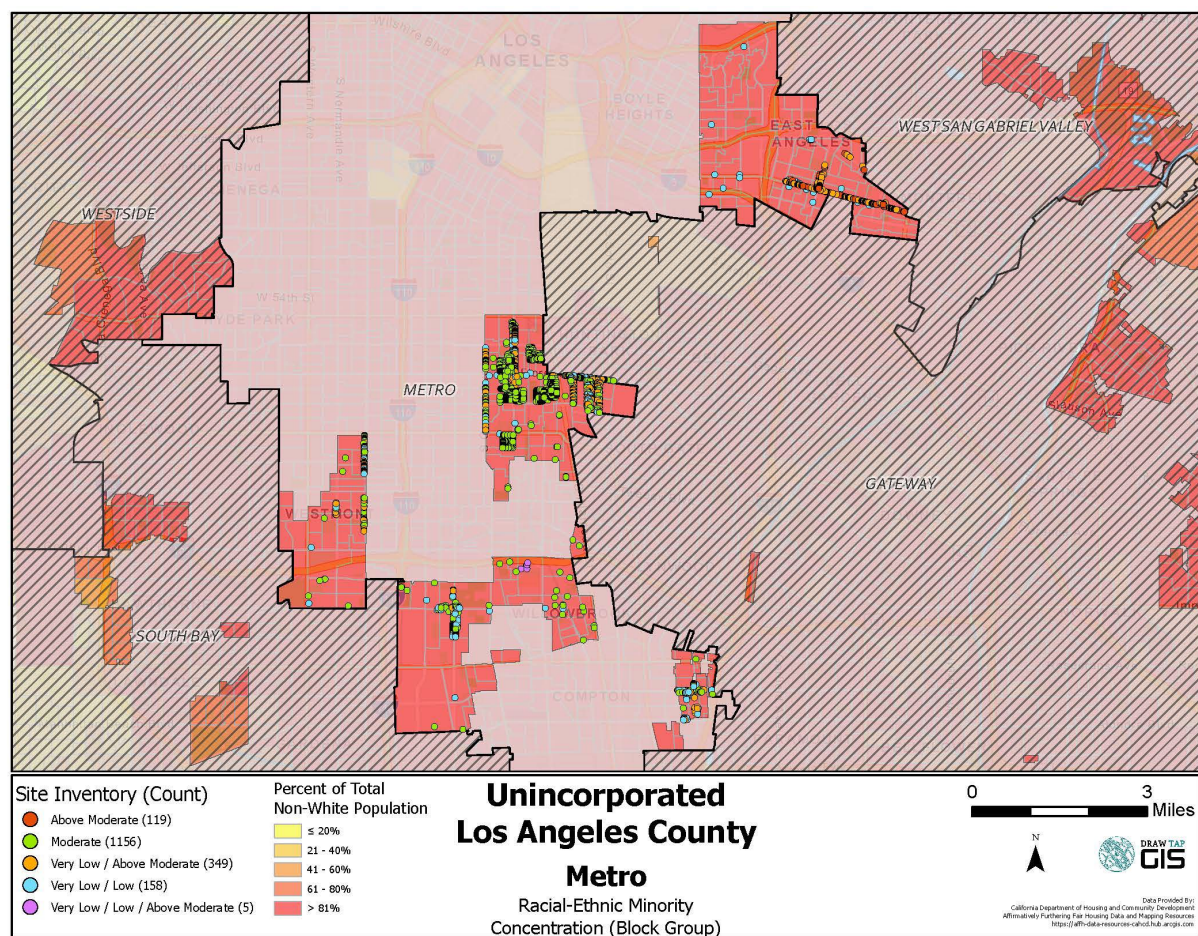


Figure E-49: Sites Inventory/Rezoning and Concentration of People of Color – Santa Clarita Valley Planning Area

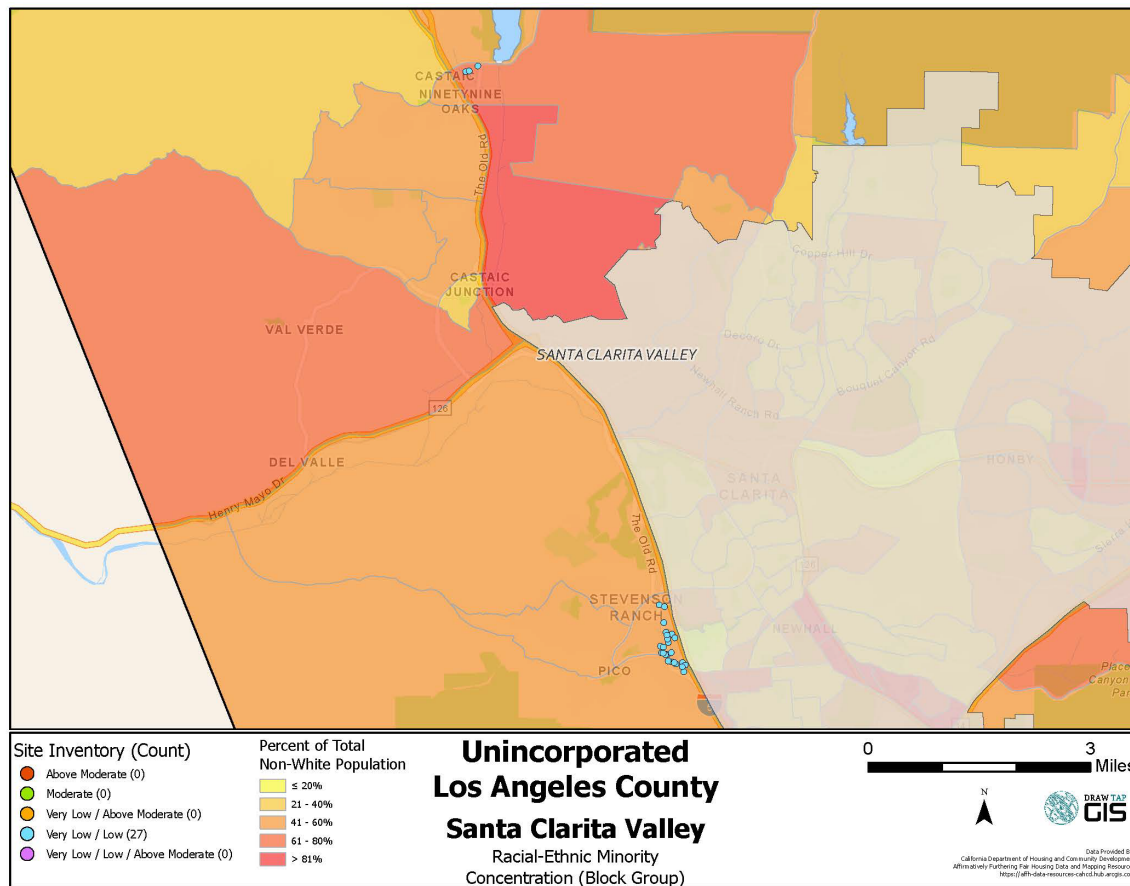


Figure E-50: Sites Inventory/Rezoning and Concentration of People of Color – South Bay Planning Area

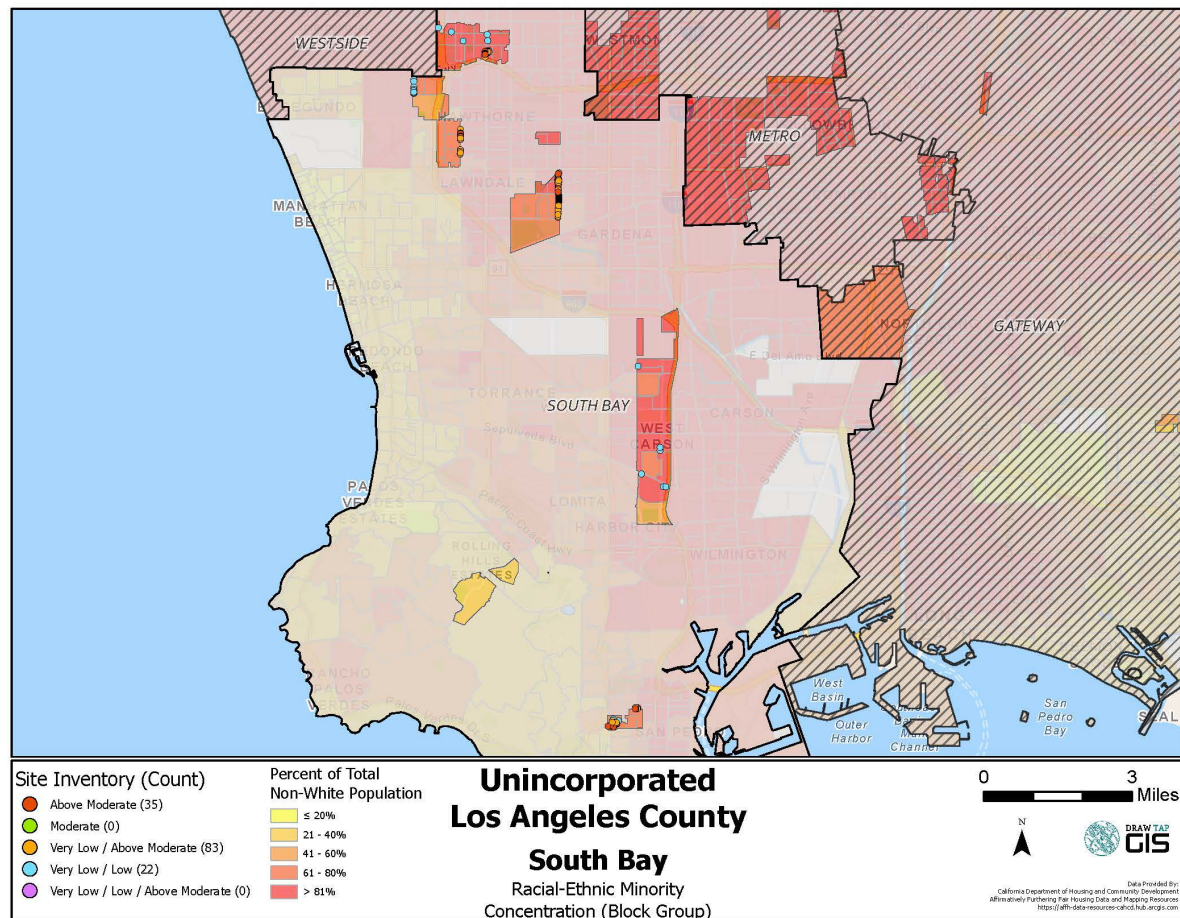


Figure E-51: Sites Inventory/Rezoning and Concentration of People of Color – West San Gabriel Valley Planning Area

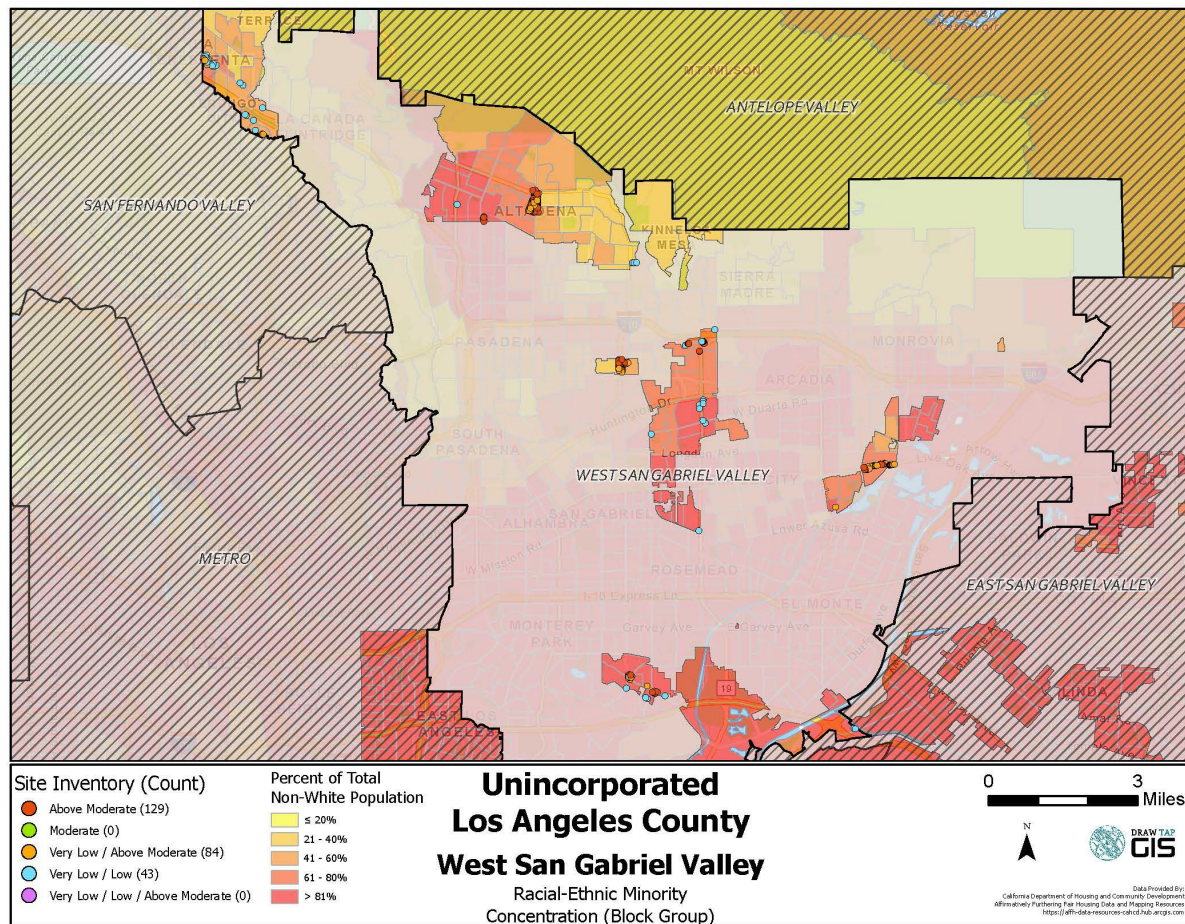
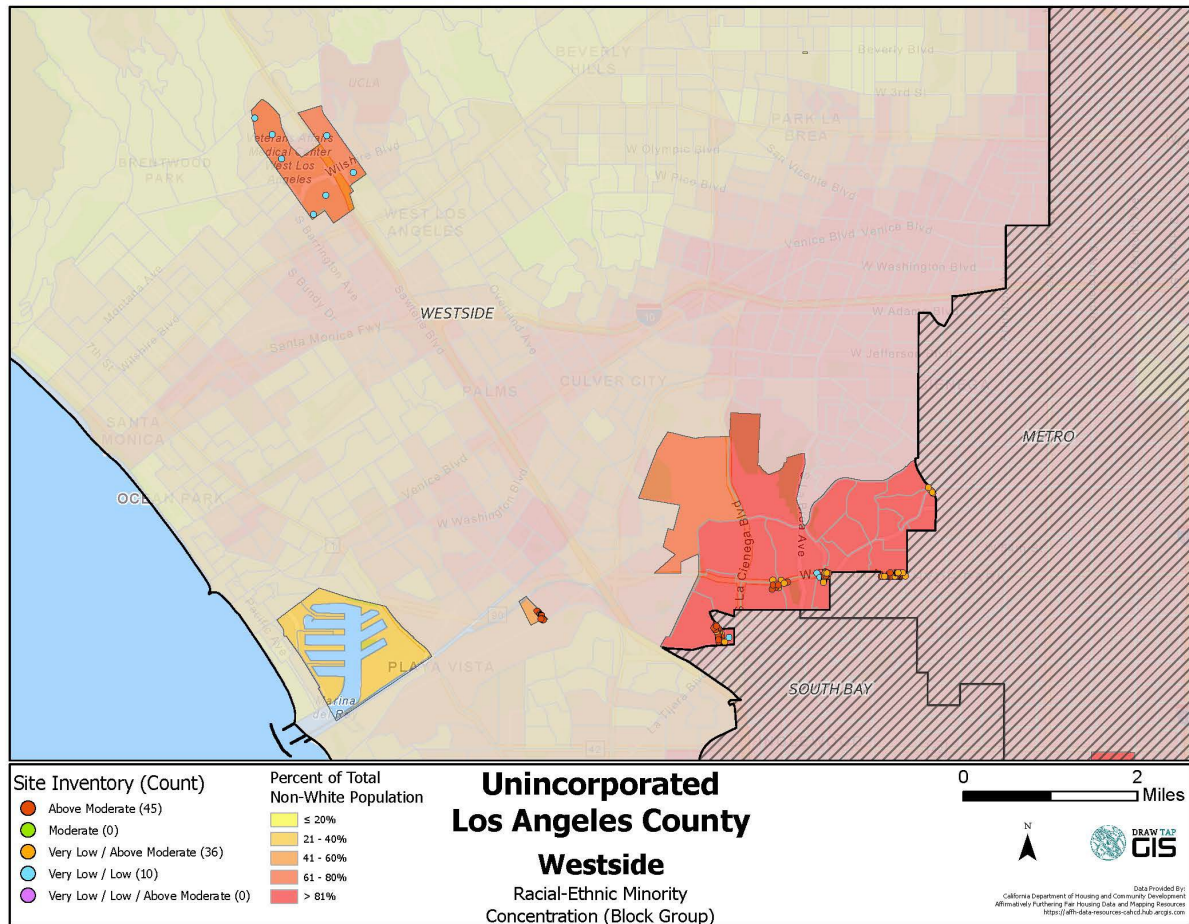


Figure E-52 Sites Inventory/Rezoning and Concentration of People of Color – Westside Planning Area



Familial Status

Most census tracts with RHNA units have moderately high concentrations of children in married couple households and low concentrations of children in female-headed households, not unlike the general distribution of families throughout the unincorporated areas. The distribution of RHNA units by percent of children in married couple households is shown in **Table E-25** and **Figure E-53**. **Table E-26** and **Figure E-54** show the distribution of RHNA units and percent of children in female-headed households.

There are no RHNA units in tracts where less than 20 percent of children live in married couple households. Most above moderate units (83 percent) are in tracts where a majority of children, 60 percent or more, live in married couple households, compared to just under 65.8 percent of lower income units and 25.1 percent of moderate income. There are no RHNA units in tracts where more than 60 percent of children live in single-parent female-headed households. Almost all units are in tracts where fewer than 40 percent of children live in female-headed households.

Westside and Metro are the only Planning Areas with sites in tracts where more than 40 percent of children live in female-headed households. Approximately 10.7 percent of units in the Westside Planning Area and 1.2 percent of units in the Metro Planning Area have 40 to 60 percent of children living in female-headed households. The sites distribution and concentration of children in female-headed households for the Metro and Westside Planning Areas are shown in **Table E-26** and **Figures E-55** and **E-56**.

Table E-25: Distribution of RHNA Units (Sites Inventory and Rezoning) by Percent of Children in Married Couple Households

Planning Area	Percent of Children in Married Couple Households										Total Units
	<20%	20-40%		40-60%		60-80%		>80%			
Lower Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	0.0%	0	0.0%	0	5.1%	363	77.8%	5,518	17.1%	1,211	7,092
Gateway	0.0%	0	0.0%	0	5.9%	84	60.2%	855	33.9%	481	1,420
Metro	0.0%	0	4.8%	565	75.9%	8,910	18.9%	2,217	0.4%	50	11,742
Santa Clarita Valley	0.0%	0	0.0%	0	0.0%	0	100.0%	1,179	0.0%	0	1,179
South Bay	0.0%	0	0.0%	0	0.6%	17	60.3%	1,780	39.2%	1,157	2,954
West San Gabriel Valley	0.0%	0	0.0%	0	3.9%	125	45.1%	1,463	51.0%	1,656	3,244
Westside	0.0%	0	0.0%	0	16.0%	556	30.5%	1,060	53.4%	1,854	3,470
Total	0.0%	0	1.8%	565	32.3%	10,055	45.2%	14,072	20.6%	6,409	31,101
Moderate Income RHNA Units											

Planning Area	Percent of Children in Married Couple Households										Total Units
	<20%		20-40%		40-60%		60-80%		>80%		
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
Antelope Valley	0.0%	0	0.0%	0	61.0%	780	26.3%	336	12.7%	163	1,279
Metro	0.0%	0	2.2%	208	74.5%	6,993	23.3%	2,183	0.0%	0	9,384
Total	0.0%	0	2.0%	208	72.9%	7,773	23.6%	2,519	1.5%	163	10,663
Above Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	0.0%	0	0.0%	0	0.0%	0	91.8%	3,828	8.2%	344	4,172
Gateway	0.0%	0	0.0%	0	0.0%	0	86.6%	4,548	13.4%	703	5,251
Metro	0.0%	0	3.5%	222	46.1%	2,902	50.4%	3,176	0.0%	0	6,300
South Bay	0.0%	0	0.0%	0	0.0%	0	70.9%	2,696	29.1%	1,105	3,801
West San Gabriel Valley	0.0%	0	0.0%	0	8.7%	369	54.9%	2,327	36.3%	1,539	4,235
Westside	0.0%	0	0.0%	0	38.2%	968	7.3%	184	54.5%	1,382	2,534
Total	0.0%	0	0.8%	222	16.1%	4,239	63.7%	16,759	19.3%	5,073	26,293

Table E-26: Distribution of RHNA Units (Sites Inventory and Rezoning) by Percent of Children in Female-Headed Households

Planning Area	Percent of Children in Female-Headed Households										Total Units
	<20%	20-40%	40-60%	60-80%	>80%						
Lower Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	81.9%	5,805	18.1%	1,287	0.0%	0	0.0%	0	0.0%	0	7,092
Gateway	75.3%	1,069	24.7%	351	0.0%	0	0.0%	0	0.0%	0	1,420
Metro	13.2%	1,547	84.7%	9,943	2.1%	252	0.0%	0	0.0%	0	11,742
Santa Clarita Valley	100.0 %	1,179	0.0%	0	0.0%	0	0.0%	0	0.0%	0	1,179
South Bay	58.6%	1,731	41.4%	1,223	0.0%	0	0.0%	0	0.0%	0	2,954
West San Gabriel Valley	88.4%	2,869	11.6%	375	0.0%	0	0.0%	0	0.0%	0	3,244
Westside	62.4%	2,166	29.7%	1,032	7.8%	272	0.0%	0	0.0%	0	3,470
Total	52.6%	16,366	45.7%	14,211	1.7%	524	0.0%	0	0.0%	0	31,101
Moderate Income RHNA Units											

Planning Area	Percent of Children in Female-Headed Households										Total Units
	<20%		20-40%		40-60%		60-80%		>80%		
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
Antelope Valley	40.3%	516	59.7%	763	0.0%	0	0.0%	0	0.0%	0	1,279
Metro	20.9%	1,964	78.9%	7,402	0.2%	18	0.0%	0	0.0%	0	9,384
Total	23.3%	2,480	76.6%	8,165	0.2%	18	0.0%	0	0.0%	0	10,663
Above Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	81.8%	3,412	18.2%	760	0.0%	0	0.0%	0	0.0%	0	4,172
Gateway	81.8%	4,294	18.2%	957	0.0%	0	0.0%	0	0.0%	0	5,251
Metro	17.5%	1,101	81.4%	5,129	1.1%	70	0.0%	0	0.0%	0	6,300
South Bay	62.6%	2,379	37.4%	1,422	0.0%	0	0.0%	0	0.0%	0	3,801
West San Gabriel Valley	88.3%	3,741	11.7%	494	0.0%	0	0.0%	0	0.0%	0	4,235
Westside	85.4%	2,165	0.0%	0	14.6%	369	0.0%	0	0.0%	0	2,534
Total	65.0%	17,092	33.3%	8,762	1.7%	439	0.0%	0	0.0%	0	26,293

Figure E-53: Distribution of RHNA Units (Sites Inventory and Rezoning) by Children in Married Couple Households

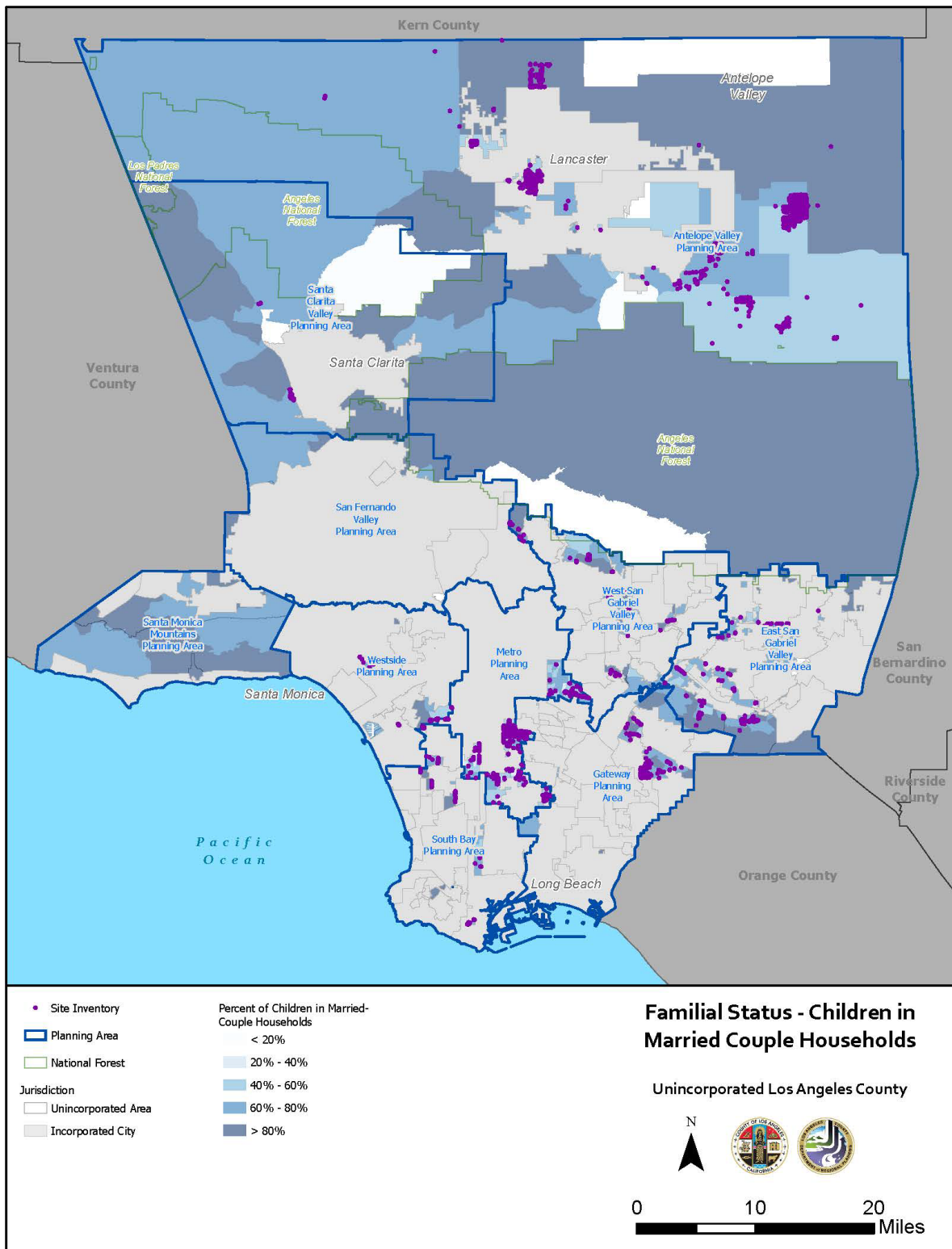
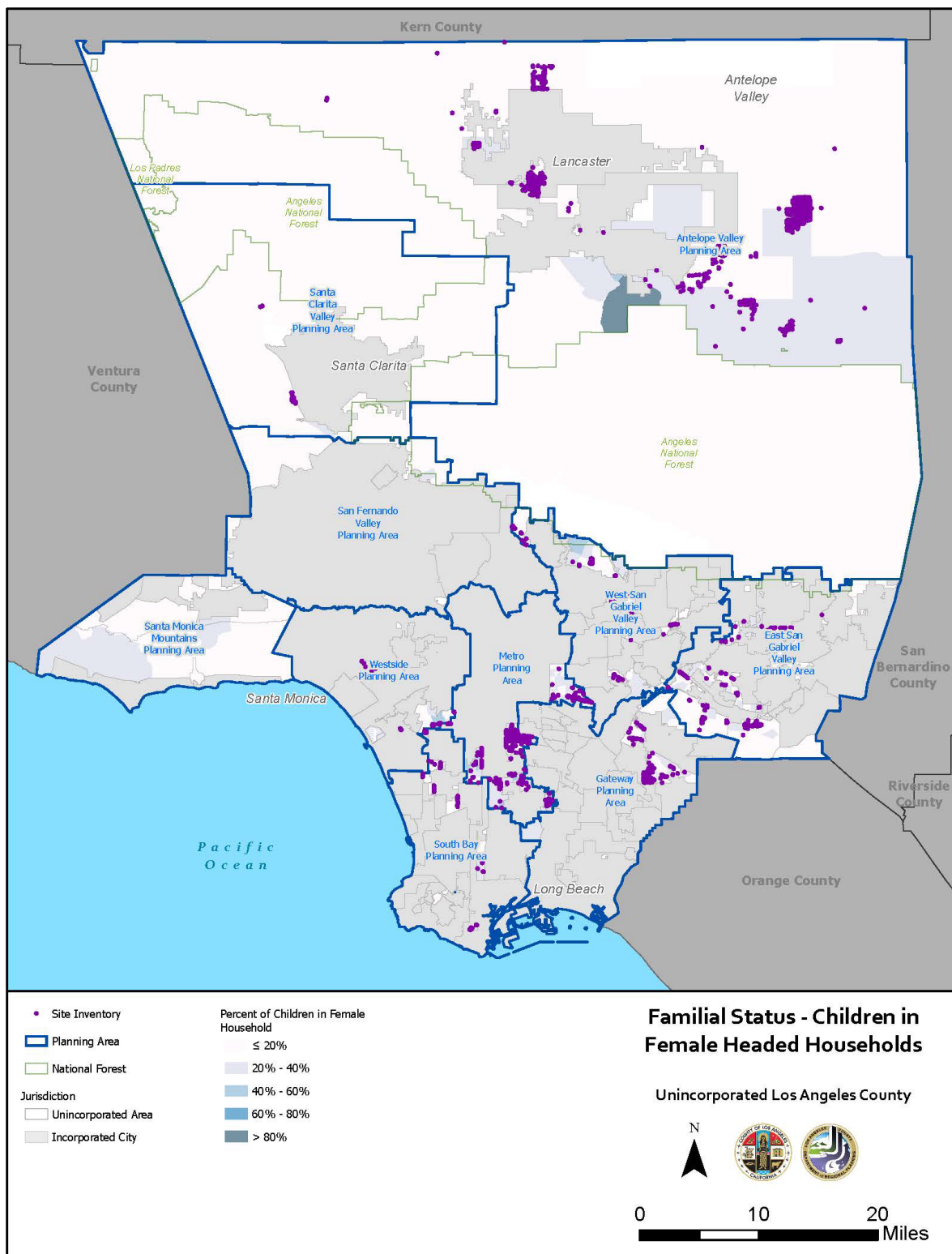


Figure E-54: Distribution of RHNA Units (Sites Inventory and Rezoning) by Percent of Children in Female-Headed Households



May 17, 2022

Figure E-55: Sites Inventory/Rezoning and Children in Female-Headed Households – Metro Planning Area

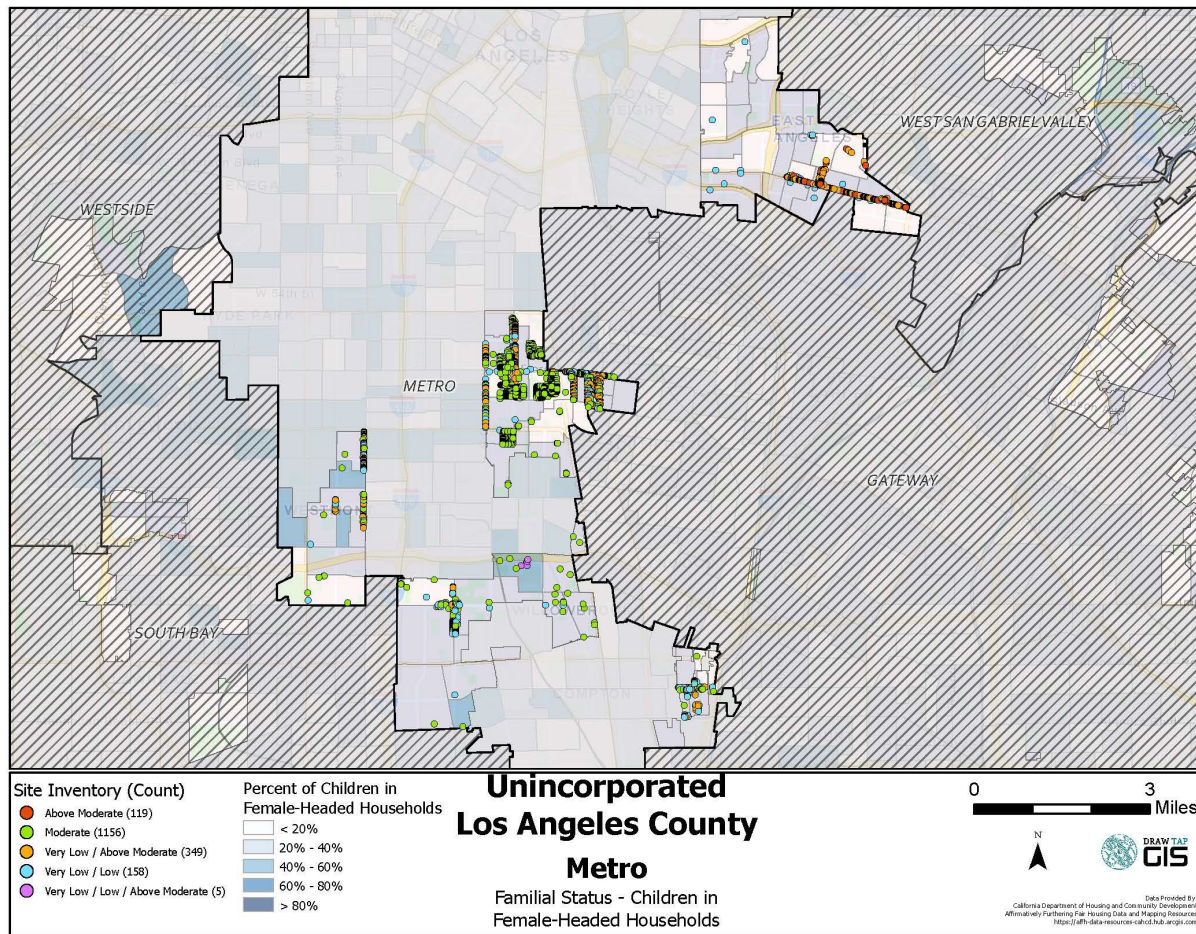
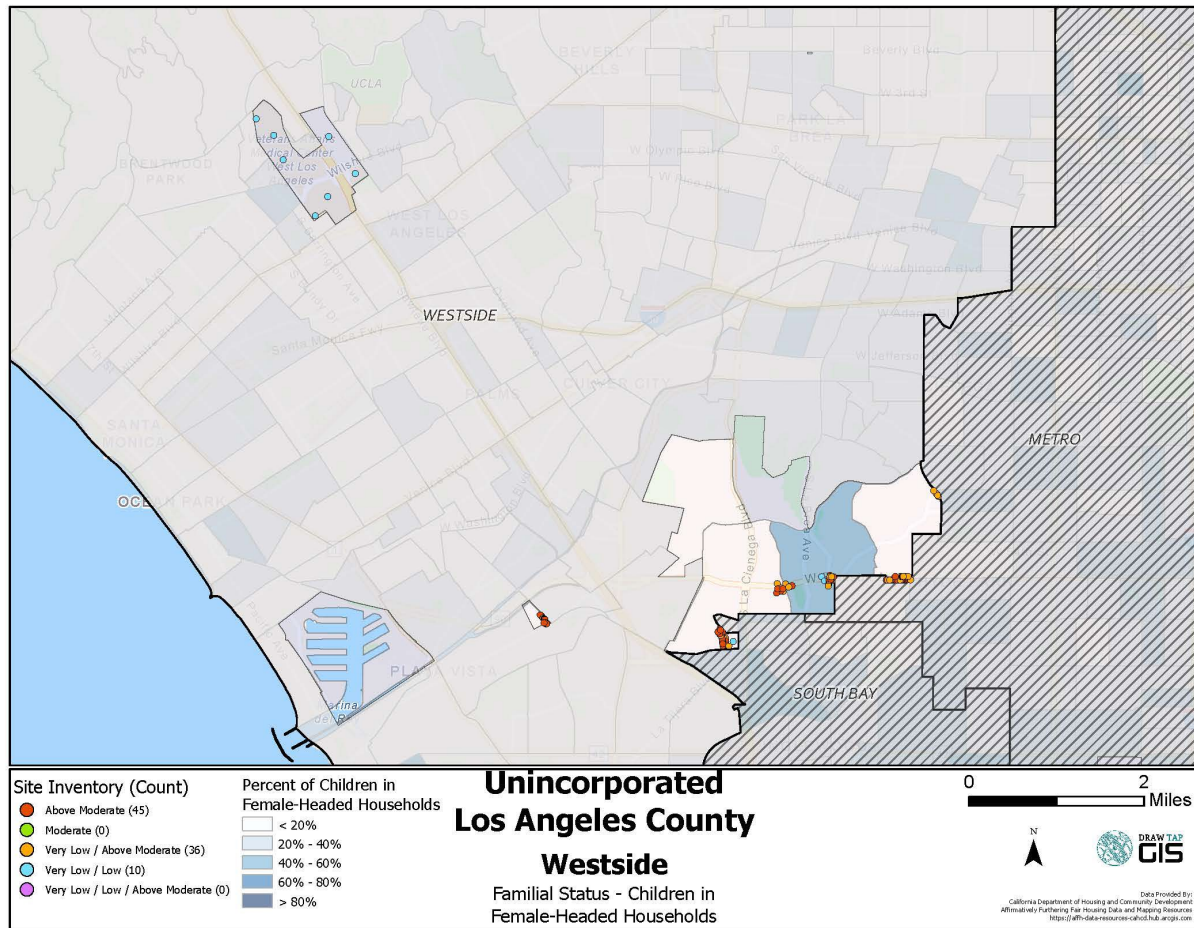


Figure E-56: Sites Inventory/Rezoning and Children in Female-Headed Households – Westside Planning Area



Persons with Disabilities

As discussed previously, the distribution of persons with disabilities is fairly consistent throughout the unincorporated areas. The construction of new units, especially multifamily units, has the potential to expand accessible housing opportunities for persons with disabilities. Multifamily housing new construction is subject to the accessibility requirements of ADA and the California Building Codes. The distribution of RHNA units by disability status is shown in **Table E-27** and **Figure E-57**.

All moderate and above moderate units used to meet the 2021-2029 RHNA are in tracts with a population of persons with disabilities smaller than 20 percent. There are no units in tracts where the population of persons experiencing disabilities exceeds 60 percent. Only 3.4 percent of lower income units are in tracts with a population of persons with disabilities between 20 and 60 percent. The remaining 96.5 lower income units are in tracts where less than 20 percent of the population experiences a disability.

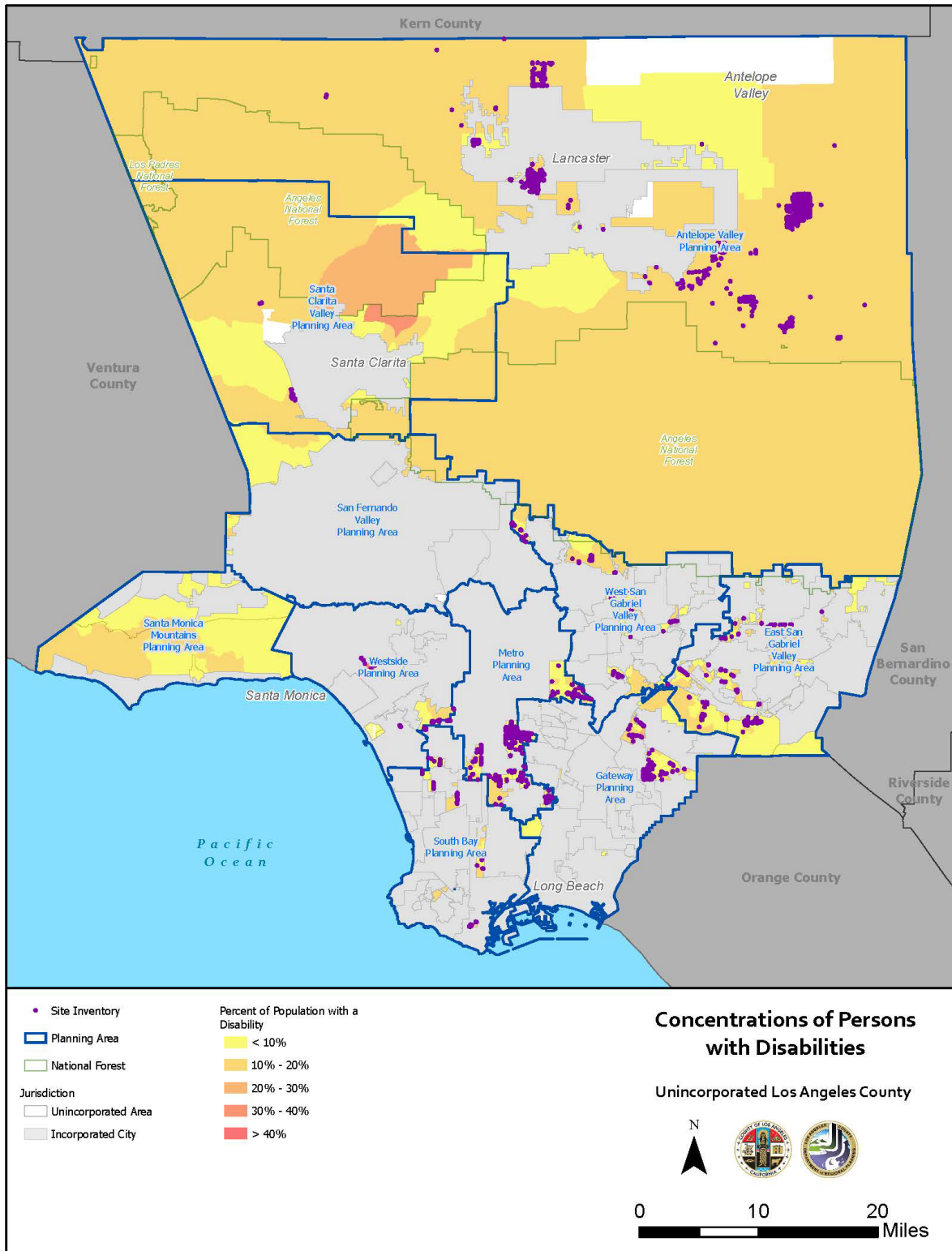
Gateway and Westside are the only Planning Areas with lower income units in tracts with a population of persons with disabilities exceeding 20 percent. Approximately 3.2 percent of lower income units in the Gateway Planning Area are in tracts where persons with disabilities make up 20 to 40 percent of the population, and 29.7 percent of lower income units in the Westside Planning Area are in tracts where persons with disabilities make up 40 to 60 percent of the population. Populations of persons with disabilities and the Sites Inventory are shown in **Table E-27** and **Figures E-58** and **E-59** for the Gateway and Westside Planning Areas.

Table E-27: Distribution of RHNA Units (Sites Inventory and Rezoning) by Disability Status

Planning Area	Percent of Persons with Disabilities in Census Tracts										Total Units
	<20%	20-40%		40-60%		60-80%		>80%			
Lower Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	100.0%	7,092	0.0%	0	0.0%	0	0.0%	0	0.0%	0	7,092
Gateway	96.8%	1,375	3.2%	45	0.0%	0	0.0%	0	0.0%	0	1,420
Metro	100.0%	11,742	0.0%	0	0.0%	0	0.0%	0	0.0%	0	11,742
Santa Clarita Valley	100.0%	1,179	0.0%	0	0.0%	0	0.0%	0	0.0%	0	1,179
South Bay	100.0%	2,954	0.0%	0	0.0%	0	0.0%	0	0.0%	0	2,954
West San Gabriel Valley	100.0%	3,244	0.0%	0	0.0%	0	0.0%	0	0.0%	0	3,244
Westside	70.3%	2,438	0.0%	0	29.7%	1,032	0.0%	0	0.0%	0	3,470
Total	96.5%	30,024	0.1%	45	3.3%	1,032	0.0%	0	0.0%	0	31,101
Moderate Income RHNA Units											

Planning Area	Percent of Persons with Disabilities in Census Tracts										Total Units
	<20%		20-40%		40-60%		60-80%		>80%		
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
Antelope Valley	100.0%	1,279	0.0%	0	0.0%	0	0.0%	0	0.0%	0	1,279
Metro	100.0%	9,384	0.0%	0	0.0%	0	0.0%	0	0.0%	0	9,384
Total	100.0%	10,663	0.0%	0	0.0%	0	0.0%	0	0.0%	0	10,663
Above Moderate Income RHNA Units											
	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	% Units in PA	# Units in PA	Total in PA
East San Gabriel Valley	100.0%	4,172	0.0%	0	0.0%	0	0.0%	0	0.0%	0	4,172
Gateway	100.0%	5,251	0.0%	0	0.0%	0	0.0%	0	0.0%	0	5,251
Metro	100.0%	6,300	0.0%	0	0.0%	0	0.0%	0	0.0%	0	6,300
South Bay	100.0%	3,801	0.0%	0	0.0%	0	0.0%	0	0.0%	0	3,801
West San Gabriel Valley	100.0%	4,235	0.0%	0	0.0%	0	0.0%	0	0.0%	0	4,235
Westside	100.0%	2,534	0.0%	0	0.0%	0	0.0%	0	0.0%	0	2,534
Total	100.0%	26,293	0.0%	0	0.0%	0	0.0%	0	0.0%	0	26,293

Figure E-57: Distribution of RHNA Units (Sites Inventory and Rezoning) by Disability Status



May 17, 2022

Figure E-58: Sites Inventory/Rezoning and Concentration of Persons with Disabilities – Gateway Planning Area

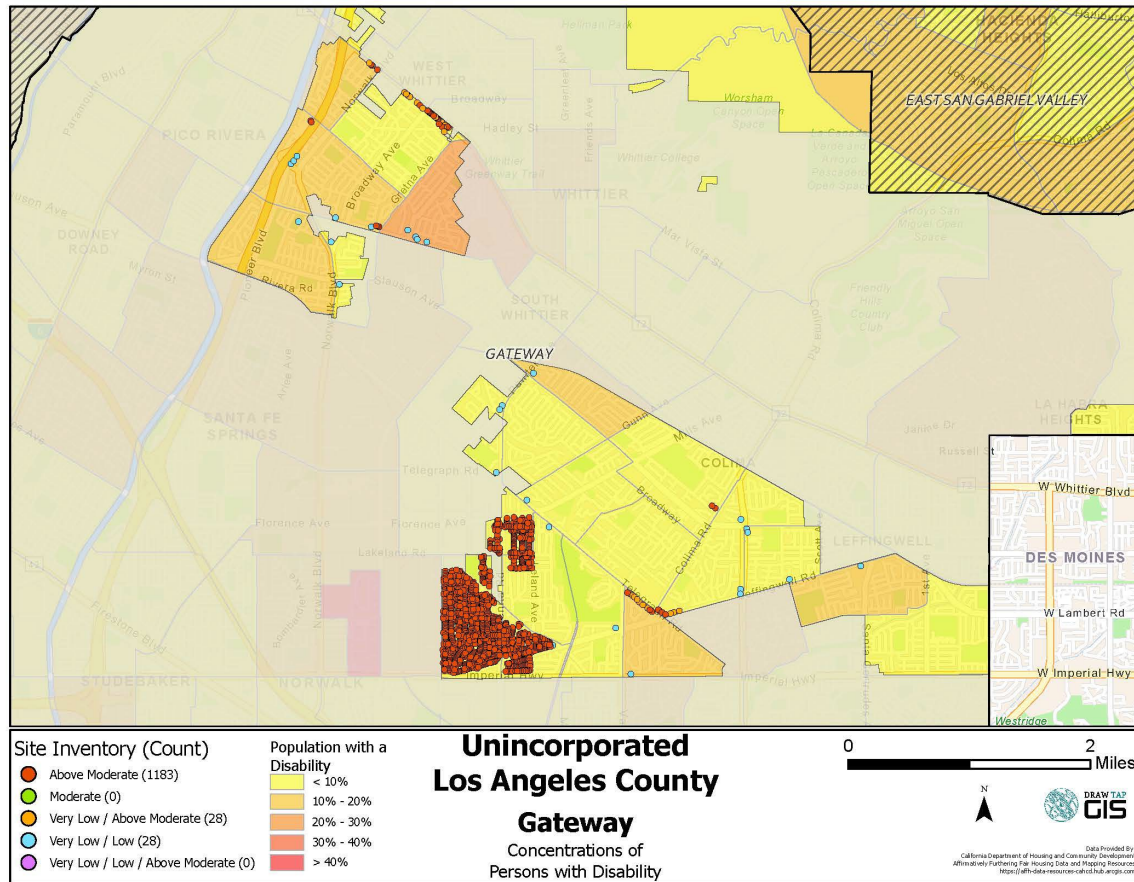
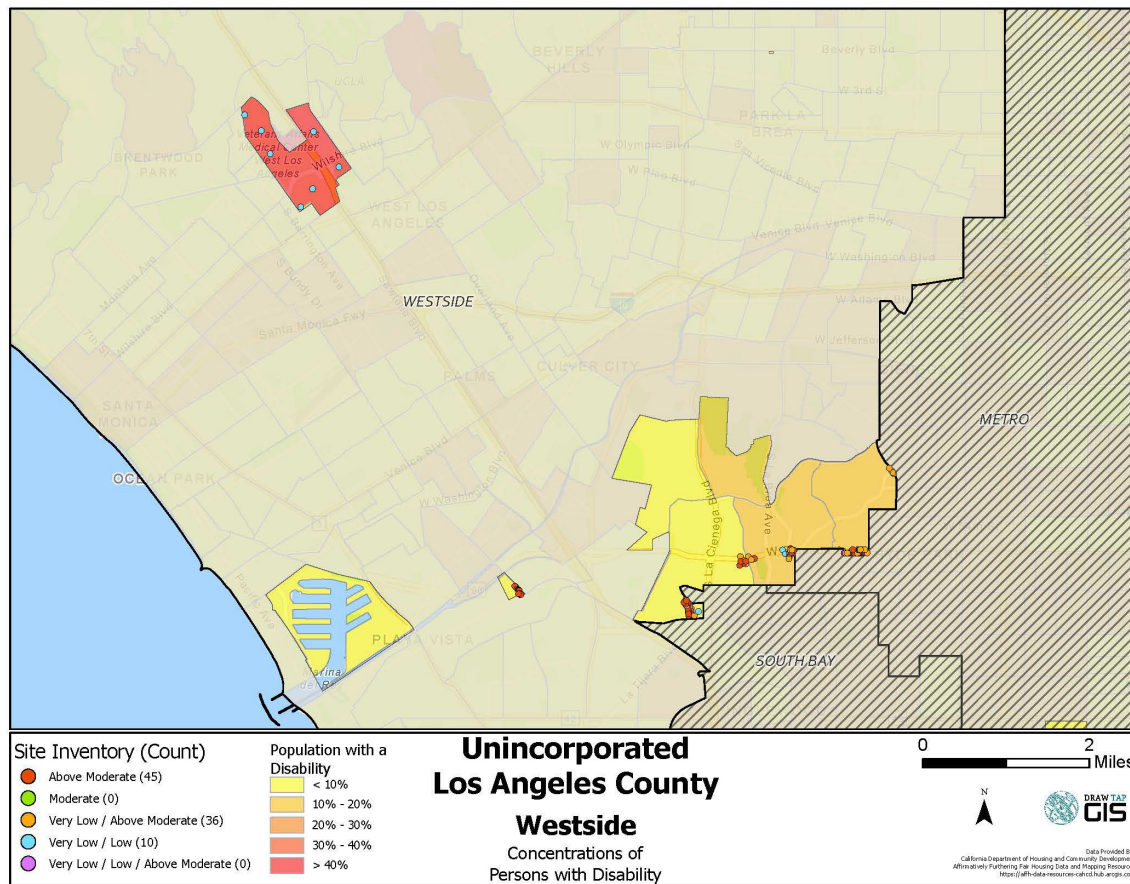


Figure E-59: Sites Inventory/Rezoning and Concentration of Persons with Disabilities – Westside Planning Area



IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

To address the fair housing issues identified in this analysis, the County has identified the following contributing factors to prioritize through the actions presented in Section 4, *Priorities, Goals, and Actions*, below:

- **Presence of a R/ECAP** – As shown in **Figure E-8**, there are six R/ECAP census tracts located in the unincorporated areas. To mitigate the presence of R/ECAPs, the County will focus on the concentration of affordable housing units and Housing Choice Voucher holders, the limitations of economic mobility opportunities, and lack of public investment.
- **Displacement of residents due to economic pressures** – Sensitive communities at risk of displacement as shown in **Figure E-20**. The County will address unaffordable rents and sales prices, the shortage of subsidized housing units, the concentration of poverty in low resource areas, costs of repairs or rehabilitation, dominance of single-family housing, and discriminatory lending practices to reduce displacement risk among unincorporated area households.
- **Disproportionate access to services** – Access to services, including economic, education, and transportation opportunities, are discussed in the *Access to Opportunities* section. To address some of the issues identified in this analysis, the County will focus on expanding the supply of housing units that are accessible to public transit and high-quality school systems.
- **Substandard housing conditions** – As discussed, substandard housing conditions, including aging housing and housing in need of repair, often disproportionately affect lower income households. To mitigate substandard housing issues for all unincorporated area residents, the County will address the aging housing stock, cost of repairs, and code enforcement.

These contributing factors and supplementary actions are further described in the following section.

PRIORITIES, GOALS, AND ACTIONS

To affirmatively further fair housing, the County will engage in a range of activities:

Table E-28: AFFH Strategies

Fair Housing Issue	Contributing Factors	Relevant Programs
Presence of a R/ECAP	Concentration of affordable housing units	<ul style="list-style-type: none"> • Marina del Rey Affordable Housing Policy • Inclusionary Housing Feasibility and Implementation • Workforce Housing Opportunity Zones • East San Gabriel Valley Area Plan • South Bay Area Plan • Westside Area Plan • West San Gabriel Valley Area Plan • Accessory Dwelling Units Construction • Missing Middle Program
	Concentration of Housing Choice Voucher holders	<ul style="list-style-type: none"> • See Programs under "Concentration of affordable housing units."

Table E-28: AFFH Strategies

Fair Housing Issue	Contributing Factors	Relevant Programs
		<ul style="list-style-type: none"> • Section 8 Rental Assistance
	Limited economic mobility opportunities	<ul style="list-style-type: none"> • Florence-Firestone TOD Specific Plan • Metro Area Plan • Family Self-Sufficiency Program • Equity Audit of Land Use Plans, and Zoning Code, and Infrastructure Planning
	Lack of public investment	<ul style="list-style-type: none"> • Florence-Firestone TOD Specific Plan • Metro Area Plan • Affordable Housing and Sustainable Communities • Park Access for New Residential Development • Equity Audit of Land Use Plans, and Zoning Code, and Infrastructure Planning
Displacement of residents due to economic pressures	Unaffordable rents and sales prices	<ul style="list-style-type: none"> • Metro Area Plan <ul style="list-style-type: none"> • South Bay Area Plan • Westside Area Plan • West San Gabriel Valley Area Plan • Pilot Community Land Trust Program • Housing for Acutely Low Income Households Program • Inclusionary Housing Feasibility and Implementation • Tenant Opportunity to Purchase Ordinance • Section 8 Rental Assistance • Affordable Housing Program Budget • Countywide Affordable Rental Housing Development • State Housing Legislation Advocacy • Emergency Preservation and Tenant Assistance Fund • Rent Stabilization and Mobilehome Rent Stabilization Ordinances • Stay Housed L.A. County • Rapid Re-Housing and Shallow Subsidy Programs • Supportive Housing Programs • Homebuyer Assistance • Adequate Sites for RHNA <ul style="list-style-type: none"> • Anti-Displacement Mapping Tool and Displacement Risk Study
	Shortage of subsidized housing units	<ul style="list-style-type: none"> • Countywide Affordable Rental Housing Development • Affordable Housing Program Budget • Preservation of At-Risk Housing • State Housing Legislation Advocacy • Preservation Database • Emergency Preservation and Tenant Assistance Fund • Affordable Housing and Sustainable Communities • Development of County-owned Sites

Table E-28: AFFH Strategies

Fair Housing Issue	Contributing Factors	Relevant Programs
	Cost of repairs or rehabilitation	<ul style="list-style-type: none"> • Lead-based Paint Settlement Housing Remediation • Employee Home Repair Community Service • Ownership Housing Rehabilitation Assistance
	Dominance of single family housing, which is typically more expensive than multifamily	<ul style="list-style-type: none"> • East San Gabriel Valley Area Plan • South Bay Area Plan • Westside Area Plan • West San Gabriel Valley Area Plan • Missing Middle Program • Workforce Housing Opportunity Zones • Accessory Dwelling Units Construction • Housing Types Definitions Program • Adaptive Reuse Ordinance
	Discriminatory lending practices	<ul style="list-style-type: none"> • Affirmatively Furthering Fair Housing Program • Homebuyer Assistance
Disproportionate access to services	Insufficient supply of accessible housing units	<ul style="list-style-type: none"> • Reasonable Accommodations Ordinance Update and Removal of Zoning Barriers to Fair Housing • Best Practices for Accessible Housing • Public Housing Modernization Program
	Limited public transit availability	<ul style="list-style-type: none"> • Climate Action Plan • East San Gabriel Valley Area Plan
Substandard housing conditions	Age of housing stock	<ul style="list-style-type: none"> • Lead-based Paint Settlement Housing Remediation • Public Housing Modernization Program • Ownership Housing Rehabilitation Assistance • Childhood Lead Poisoning Prevention Program • Multifamily Housing Rehabilitation • Systematic Code Enforcement
	Cost of repairs or rehabilitation	<ul style="list-style-type: none"> • Lead-based Paint Settlement Housing Remediation • Ownership Housing Rehabilitation Assistance • Multifamily Housing Rehabilitation • Systematic Code Enforcement
	Lack of code enforcement or delayed maintenance	<ul style="list-style-type: none"> • Lead-based Paint Settlement Housing Remediation • Ownership Housing Rehabilitation Assistance • Multifamily Housing Rehabilitation • Systematic Code Enforcement

APPENDIX F: LIST OF QUALIFIED ENTITIES

Organization	Address	City	ZIP Code	Phone number	Added to List
New Economics for Women	303 South Loma Drive	Los Angeles	90017	(213) 483-2060 ext 304	12/6/19
San Gabriel Valley Habitat for Humanity, Inc.	400 S Irwindale Ave	Azusa	91702	(626) 709-3277	8/12/2019
Santa Fe Art Colony Tenants Association	2415 S. Sante Fe Avenue, Unit 2	Los Angeles	90058	(310) 663-6665	5/2/19
Los Angeles County Development Authority	700 W. Main Street	Alhambra	91801	(626) 586-1816	4/18/19
Community Development Commission	700 W. Main Street	Los Angeles	91801	(626) 586-1812	8/17/17
Innovative Housing Opportunities, Inc.	19772 Macarthur Bv., Ste. 110	Irvine	92612	(949) 863-9740	4/6/17
Abbey Road Inc.	15305 Rayen Street	North Hills	91343	(818) 332-8008	3/28/12
ROEM Development Corporation	1650 Lafayette Circle	Santa Clara	65050	(408) 984-5600 Ext 17	3/30/11
CSI Support & Development Services	201 E. Huntington Drive	Monrovia	91016	(626) 599-8464	9/27/10
Clifford Beers Housing, Inc.	1200 Wilshire Blvd. Ste. 205	Los Angeles	90017		5/3/07
Coalition for Economic Survival	514 Shatto Place, Suite 270	Los Angeles	90020	(213) 252-4411	6/8/06
Keller & Company	4309 Argos Drive	San Diego	92116		2/8/06
Poker Flats LLC	1726 Webster	Los Angeles	90026		2/8/06
Hart Community Homes	2807 E. Lincoln Ave	Anaheim	92086	(714) 630-1007	12/27/05
Home and Community	2425 Riverside Place	Los Angeles	90039	(213) 910-9738	11/28/05
Orange Housing Development Corporation	414 E. Chapman Avenue	Orange	92866	(714) 288-7600	6/10/05
Los Angeles Housing & Community Invest Dept	1200 W. 7th Street, 9th Floor	Los Angeles	90017	(213) 808-8654	3/15/05
Many Mansions, Inc.	1459 E. Thousand Oaks Blvd., Ste. C	Thousand Oaks	91362	(805) 496-4948	4/28/04
Winnetka King, LLC	23586 Calabasas Road, Ste. 100	Los Angeles	91302	(818) 222-2800	4/28/04
A Community of Friends	9 Cushing, Ste. 200	Irvine	92618	(415) 856-0010	2/4/04

Organization	Address	City	ZIP Code	Phone number	Added to List
Francis R. Hardy, Jr.	2735 W. 94th Street	Inglewood	90305	(323) 756-6533	9/18/03
Nexus for Affordable Housing	1572 N. Main Street	Orange	92867	(714) 282-2520	7/13/01
LTSC Community Development Corporation	231 East Third Street, Ste. G 106	Los Angeles	90013	(213) 473-1606	4/25/01
The East Los Angeles Community Union (TELACU)	1248 Goodrich Blvd.	Los Angeles	90022	(323) 838-8556	1/29/01
Southern California Presbyterian Homes	516 Burchett St	Glendale	91203	(818) 247-0420	12/29/00
Abode Communities	701 E. Third St., Ste. 400	Los Angeles	90015	(213) 629-2702	3/9/00
Housing Corporation of America	31423 Coast Highway, Ste. 7100	Laguna Beach	92677	(323) 726-9672	6/10/99
Long Beach Affordable Housing Coalition, Inc	5855 Naples Plaza, Suite 209	Long Beach	90803	(562) 434-3333	5/19/99
Korean Youth & Community Center, Inc. (KYCC)	680 S. Wilton Place	Los Angeles	90005	(213) 365-7400	1/19/99
The Long Beach Housing Development Co.	836 Avalon Ave	Lafayette	94549	(925) 385-0754	1/12/99
PICO Union Housing Corporation	1038 Venice Blvd.	Los Angeles	90015	(213) 747-2790	1/12/99
American Family Housing	15161 Jackson St.	Midway City	92655	(714) 897-3221	1/6/99
FAME Corporation	1968 W. Adams Blvd.	Los Angeles	90018	(323) 730-7727	12/28/98
Housing Authority of the City of Los Angeles	2500 Wilshire Blvd, PHA	Los Angeles	90057	(213) 252-4269	12/24/98
Century Housing Corporation	1000 Corporate Pointe	Culver City	90230	(310) 642-2007	12/24/98
West Hollywood Community Housing Corp.	7530 Santa Monica Blvd, Suite 1	West Hollywood	90046	(323) 650-8771	12/23/98
City of Pomona Housing Authority	505 South Garey Ave	Pomona	91766	(909) 620-2368	12/23/98
Hollywood Community Housing Corp.	1726 N. Whitley Ave	Hollywood	90028	(323) 469-0710	12/23/98
Hope - Net	760 S. Westmoreland Ave	Los Angeles	90005	(213) 389-9949	12/23/98
Skid Row Housing Trust	1317 E. 7th St	Los Angeles	90021	(213) 683-0522	12/23/98
The Long Beach Housing Development Co.	333 W. Ocean Blvd., 2nd Flr	Long Beach	90802	(562) 570-6926	12/23/98

Organization	Address	City	ZIP Code	Phone number	Added to List
Santa Fe Art Colony Tenants Association	2415 S. Sante Fe Avenue, Unit 2	Los Angeles	90058	(310) 663-6665	

APPENDIX G: SITES INVENTORY AND REZONING METHODOLOGY

Introduction

The following is not an exhaustive list of all the GIS analyses that were completed for the Housing Element Update. This was a very complex project that analyzed over 200,000 parcels, with unincorporated Los Angeles County's complex geography of disconnected unincorporated communities. There were some changes in methodology as staff went through the process and went deeper into this analysis. As much as possible, the main processes were automated using GIS models due to the iterative nature of this project, along with the changing of variables and incorporating updated information. Web mapping applications were also used to facilitate quality control and editing among many Department of Regional Planning (DRP) staff, and to share the results with stakeholders.

Part I – Preliminary Assessment and the Development of the Sites Inventory

In August 2019, as the first step for site identification for the Sites Inventory and the Rezoning Program, DRP's GIS staff compiled a list of candidate parcels that meet all of the following criteria. While some of these criteria were directly from the State law (e.g., sites in the inventory should be between 0.5 acres and 10 acres in size), other criteria were used to exclude areas that are, in general, not suitable for housing development – particularly higher-density multi-family projects (e.g., open space areas). Some specific plan areas were excluded and the planned units within the specific plan areas were reported separately outside of the Sites Inventory.

Criteria

- All unincorporated parcels ≥ 0.5 acre and ≤ 10 acres
- Remove the following specific plans: Catalina, La Vina, Marina del Rey, Newhall Ranch, Northlake, Universal, Centennial
- Remove the following communities with a local coastal plan/in a Coastal Zone: Santa Monica Mountains LCP, Pepperdine University, Santa Catalina Island, Marina del Rey, and Ballona Wetlands
- Remove the following Land Use categories from the Antelope Valley Area Plan and General Plan communities:
 - OS-C: Open Space – Conservation
 - OS-PR: Open Space – Parks and Recreation
 - OS-NF: Open Space – National Forest
 - OS-BLM: Open Space – Bureau of Land Management

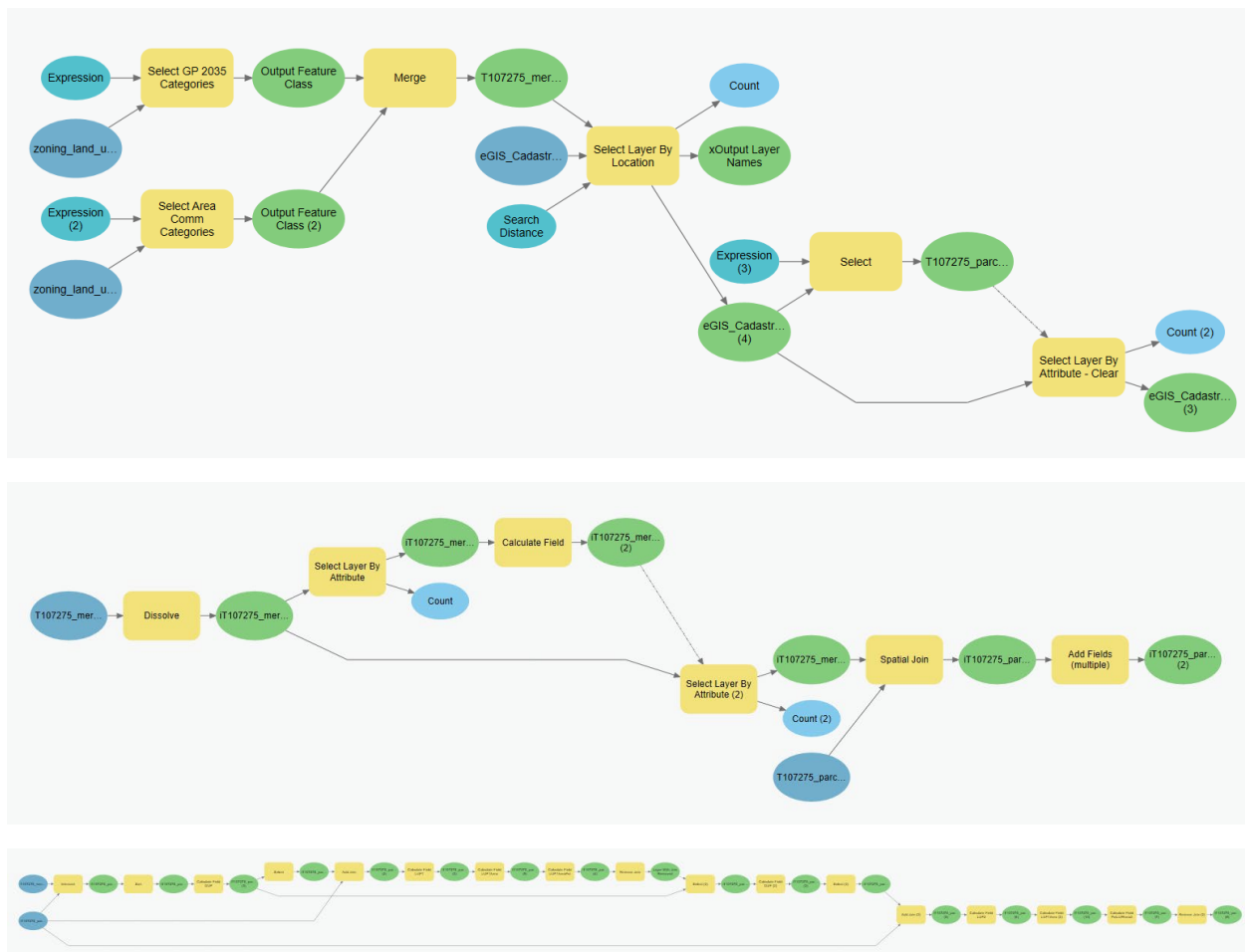
- W: Water
- MR: Mineral Resources
- ML: Military Land
- MU-R: Mixed Use – Rural (applicable to Antelope Valley only)
- CR: Rural Commercial
- IH: Heavy Industrial
- IL: Light Industrial
- RL: Rural Lands (at all densities)
- Remove the following Land Use categories from the remaining Area/Community Plan communities:
 - East Los Angeles Community Plan
 - CR: Commercial Residential
 - I: Industrial
 - OS: Open Space
 - Altadena Community Plan
 - E: Estate / Equestrian
 - N: Non-Urban
 - Hacienda Heights Community Plan
 - IL: Light Industrial
 - OS-PR: Open Space Parks and Recreation
 - RL: Rural Lands (at all densities)
 - Rowland Heights Community Plan
 - I: Industrial
 - O: Open Space
 - N1 & N2: Non-Urban
 - Santa Clarita Valley Area Plan
 - OS-C: Open Space – Conservation
 - OS-PR: Open Space – Parks and Recreation
 - OS-NF: Open Space – National Forest
 - OS-W: Open Space – Bureau of Land Management
 - MU-R: Mixed Use – Rural (applicable to Antelope Valley only)
 - IL: Light Industrial
 - IO: Industrial Office
 - RL: Rural Lands (at all densities)
 - Santa Monica Mountains North Area Plan
 - N20, N10, N5: Mountain Lands
 - Twin Lakes Community Plan
 - RC: Rural Communities
 - West Athens-Westmont Community Plan
 - CR: Commercial Recreation
 - OS.1: Recreation / Open Space
- For the remaining filtered parcels, the following Assessor data should be included:
 - APN – Assessor Parcel Number

- Address – Situs & Mailing
- Owner name – Include Owner Full Name
- Assessor Land Use – Include Description & Type
- Assessor Land Use Code
- Number of Existing Units – Units 1, 2, 3, 4, & 5; NULL values converted to zeros
- Assessor Land Value (LV)
- Assessor Improvement Value (IV)
- Land to Improvement Ratio (LV_IV_Ratio) field added. As a formula, $LV_IV_Ratio = LV/IV$. If the land is more valuable than the improvement, the number would be greater than 1.
- Parcel Size
- Building Year 1, 2, 3, 4, & 5; NULL values converted to zeros
- The following information was appended as it relates to various overlays that need to be coded into the layer. In parentheses are how the values were calculated.
 - Previous Housing Element Adequate Sites Inventory (Y/N) – 2008 & 2014
 - CSD Name (“Not Within” value calculated for parcels outside CSDs; otherwise calculated with the CSD name)
 - Very High Fire Hazard Severity Zones (Entirely Within / Partially Within / Not Within)
 - Significant Ecological Area (Entirely Within / Partially Within / Not Within)
 - Hillside Management Area (slope > 25%) (Entirely Within / Partially Within / Not Within) – Calculated with features ≥ 500 sq ft
 - Agricultural Resource Area (ARA) (Entirely Within / Partially Within / Not Within)
 - Airport Influence Area (Entirely Within / Partially Within / Not Within)
 - Environmental Justice Screening Method (overall score)
 - Tax Credit Allocation Committee (TCAC) Opportunity Areas - (Highest, High, Moderate, Low, High Segregation & Poverty)
 - Transit Oriented Districts (3rd St; W Carson; Willowbrook; Connect SW; or otherwise Not Within)
 - Ratio of LV to IV – Nulls converted to zeros (see above under From Assessor Attributes)
 - FEMA Flood, 100 year & 500 year (Entirely Within / Partially Within / Not Within)
 - Liquefaction (Entirely Within / Partially Within / Not Within)
 - Landslide (Entirely Within / Partially Within / Not Within)
 - Alquist-Priolo Zones (Entirely Within / Partially Within / Not Within)
 - Fault Trace (Lines) – Fault name, or “N/A”
 - Fault Zone (Line) – Fault zone name, or “N/A”
- Lastly, the remaining Land Use Policy, Zoning, and the TOD Specific Plan categories were included in the analysis. Multiple fields were added for those cases where there was more than one category per parcel and they record the area covered by each category, as well as the relative percentage.

GIS Modeling

For all the criteria listed above, GIS Models were developed using ModelBuilder in ArcGIS Pro. **Figure G-1** below is a sample screenshot of a few of these models. Throughout the project various models were developed so that the multiple processes could be re-run with different parameters entered in, if necessary.

Figure G-1: Sample GIS Model



The output GIS layer was exported into three datasets of sites based on parcel size, land use, and Assessor information: 1) potential vacant sites to be included in the Sites Inventory; 2) potential underutilized sites to be included in the Sites Inventory; and 3) potential sites to be included in the Rezoning Program. These datasets were organized into a series of spreadsheets, which was used as reference by DRP planners during the first round of review of sites.

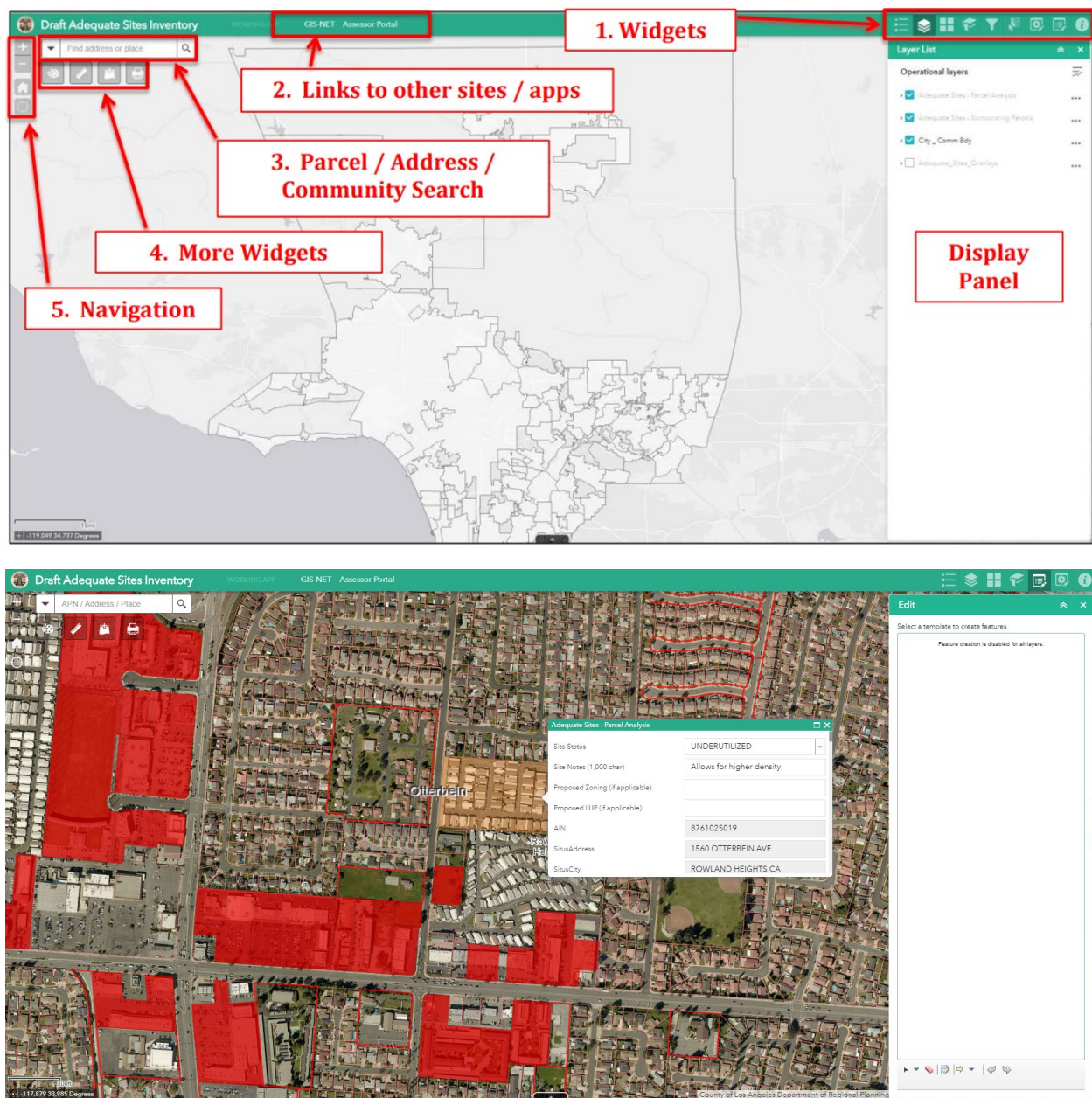
Web Mapping Application

ArcGIS Enterprise was utilized for publishing various apps throughout this project. The advantage of using this platform was that DRP staff could access a mapping application and edit data without

needing any kind of ArcGIS Online login credentials. The other advantage was that it was on the County of Los Angeles network and sensitive information (such as Assessor Parcel ownership) could be displayed.

A web mapping application (**Figure G-2**) was developed for the first round of parcel review by the DRP planners. Planners had the ability to make their edits to the GIS layer directly with their recommendation on a candidate site, which greatly streamlined the review process.

Figure G-2: Web Mapping Application



Preliminary Assessment by the Volunteer Planners

Once the GIS team compiled the first lists of parcels and generated a GIS layer of the candidate sites on the web mapping application, about 30 volunteer planners from various sections in DRP were enlisted to evaluate over 24,000 parcels to further determine housing development suitability and availability. The advantage of this approach was that various planning staff had expertise in different areas based on their experiences in community plan development, permit processing, and/or code enforcement.

To facilitate the parcel-by-parcel assessment by the volunteer planners, several training sessions were conducted on how to enter the staff recommendation and additional notes in the web mapping application. The volunteer planners were also instructed to use various tools to conduct their research, including EnerGov, which is a permit management and tracking system used by various County agencies, and GIS-NET, which is DRP's main web mapping application that has over 200 spatial layers relevant to various zoning information, planning workflows, and other historical images and aerial photos. Moreover, guiding questions were distributed to all volunteer planners to ensure that a consistent set of factors were considered.

Guiding Questions

The guiding questions were organized by three different categories: 1) a vacant site to be included in the Sites Inventory; 2) an underutilized site to be included in the Sites Inventory; and 3) a potential site to be included in the Rezoning Program. It is important to note that none of the guiding questions was meant to be used as a single determining factor. Rather, the volunteer planners were instructed to use these questions as their guide when conducting research and analysis, and tailor their recommendations based on their individual local knowledge of the communities through their work in community plan development, permit processing, and/or code enforcement.

Vacant Site to be Included in the Sites Inventory

The sites included on this list have been screened based on size, General Plan land use (30 du/ac or more), and Assessor data. Your task is to 1) verify whether the parcel is vacant; and 2) verify whether the parcel is developable and therefore, you recommend it to be included in the Sites Inventory.

Steps:

1. *Review the parcel.*
 - a. *Is it vacant?*
 - i. *Check ortho/aerial photos.*
 - ii. *Check to see if there is a recent approval or pending case for the parcel.*
 - iii. *If there is a structure(s) on the parcel, check to see if it is legally established.*
 - b. *Is it developable?*
 - i. *Is the parcel located within a special management area or subject to additional regulations that will limit development?*
 - ii. *Is the parcel supported by water, sewer, and dry utilities (electric, gas, telecommunications, television, cable)?*

- If the parcel is not vacant, please include a description of the legally established existing use in the Notes section. If you think the parcel meets the criteria of an “underutilized” parcel [See READ ME UNDERUTILIZED], select FLAG instead.
- If the parcel is not vacant, and there are no legally established uses on the site, select FLAG instead.
- If the parcel has a pending case for residential or non-residential use, or anything else, select FLAG instead.
- If the parcel has an approval for a residential use, select FLAG instead.

The sites included on this list have been screened based on size, General Plan land use (30 du/ac or more), and Assessor data. Your task is to 1) verify the existing use on the parcel; 2) verify whether the parcel is underutilized; and 3) verify whether the parcel is likely to be developed into a multifamily residential use in the next 10 years and therefore, you recommend it to be included in the Sites Inventory.

1. *Review the parcel.*
 - a. *What is the existing use?*
 - i. *Verify the existing use. Start with the Assessor's land use description.*
 - ii. *Check to see if the use(s) is legally established. Check building permit data, planning approvals.*
 - iii. *Check to see if there is a recent approval or pending case for the parcel.*
 - b. *Is it underutilized? Consider these criteria for underutilized parcels.*
 - i. *If residential, is the existing density less than the maximum allowable density permitted by the General Plan?*

- ii. *If residential, are the buildings more than 30 years old? If commercial, are the buildings more than 15 years old?*
 - iii. *Is the land to improvement ratio for the parcel greater than 1.0, which indicates that the land is more valuable than the structures on the site?*
 - c. *Is it likely to be developed into a multifamily residential use in the next 10 years?*
 - i. *Is the parcel surrounded by existing multifamily residential uses?*
 - ii. *Are there nearby (same block, same neighborhood, etc.) parcels that have recently (around last five years) been (re)developed into a multifamily residential use? What about recent approvals? Pending cases?*
 - iii. *Is the parcel located within a special management area or subject to additional regulations that will limit development?*
 - iv. *Is the site supported by water, sewer, and dry utilities (electric, gas, telecommunications, television, cable)?*
 - d. *If necessary, use any other information and/or do a site visit to make your determination. Document this in the Notes section in the mapping application, and save any files (e.g., copies of approved or pending plans, building permits, or photographs you took during site visit) in the appropriate folder.*
- 2. *In the mapping application, go to Smart Editor, and select UNDERUTILIZED, N/A, or FLAG.*

UNDERUTILIZED: Yes, this parcel is underutilized and likely to be redeveloped with multifamily residential uses in the next 10 years, and I recommend that it be included in the Sites Inventory.

N/A: No, this parcel is not underutilized and/or not likely to be redeveloped with multifamily residential uses in the next 10 years, and I do not recommend that it be included in the Sites Inventory. If the parcel has an approval for a non-residential use, please indicate in the Notes section.

 - *If the parcel is vacant], select FLAG instead.*
 - *If there are no legally established uses on the site, select FLAG instead.*
 - *If you think the parcel is likely to be redeveloped into a non-residential use, select FLAG instead.*
 - *If the parcel has a pending case for residential or non-residential use, or anything else, select FLAG instead.*
 - *If the parcel has an approval for a residential use, select FLAG instead.*

FLAG: Not sure; needs further review; parcel is vacant; no legally established uses; pending case; residential approval.
- 3. *After making your selection (UNDERUTILIZED, N/A, or FLAG) in the drop-down list, add to the Notes section. Use this section to provide an explanation for your recommendation, and to add any other information that you think would be useful.*

Potential Site to be Included in the Rezoning Program

The sites included on this list have been screened based on size, General Plan land use, and Assessor data. Your task is to 1) verify the existing use on the parcel; 2) research the land use designation and zoning history for the parcel; 3) determine the appropriateness of redesignating the parcel to H30, H50,

H100, H150, MU, CG, or CM; 4) determine the appropriateness of also rezoning the parcel; and 5) identify additional sites for redesignating/rezoning to avoid “spot designating/zoning.”

The list of parcels identified through this task will be further refined by the Housing Policy Section staff, using additional criteria to determine if the site is developable and meets the requirements of the State Housing Element Law.

Steps:

1. Review the parcel.
 - a. What is the existing use?
 - i. Verify the existing use. Start with the Assessor’s land use description.
 - ii. Check to see if the use(s) is legally established. Check building permit data, planning approvals.
 - iii. Check to see if there is a recent approval or pending case for the parcel.
 - b. What is the history of the parcel?
 - i. Check GIS-NET for the past land use designation and zoning.
 - ii. Was the parcel ever the subject of a project-based plan amendment or zone change?
 - iii. Was the parcel part of a recent comprehensive planning or rezoning effort?
 - c. Is it appropriate to redesignate the parcel to H30, H50, H100, H150, MU, CG, or CM? If so, which one?
 - i. Is the parcel surrounded by existing multifamily residential uses?
 - ii. Are there nearby (same block, same neighborhood, etc.) parcels that have recently (around last five years) been (re)developed into a multifamily residential use? What about recent approvals? Pending cases?
 - iii. Is the parcel located within a special management area¹² or subject to additional regulations that will limit development?
 - iv. Is the site supported by water, sewer, and dry utilities (electric, gas, telecommunications, television, cable)?
 - d. Is it necessary to also rezone the parcel?
 - i. Is the zoning inconsistent with the new land use designation?
 - ii. Is the zoning consistent but not well aligned with the new land use designation?
 - e. If necessary, use any other information and/or do a site visit to make your determination. Document this in the Notes section in the mapping application, and save any files (e.g., copies of approved or pending plans, building permits, or photographs you took during site visit) in the appropriate folder.
2. In the mapping application, go to Smart Editor, and select REZONING, N/A, or FLAG.

¹² See County of Los Angeles General Plan 2035 for more information on special management areas.

Land use Element: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf

Appendix C – Land Use Element Resources: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-appendices.pdf

Figure C.1 – Hazard, Environmental and Resource Constraints Map:

https://planning.lacounty.gov/assets/upl/project/gp_2035_2021-FIG_C-1_Hazard_Environmental_Constraints.pdf

REZONING: Yes, I recommend that this parcel be redesignated to H30, H50, H100, H150, MU, CG, or CM; and/or yes, I recommend that this parcel be rezoned.

N/A: No, I do not recommend redesignating/rezoning this parcel.

FLAG: Not sure; needs further review; pending case; recent approval.

3. *After making your selection (REZONING, N/A, or FLAG) in the GIS Web App, add to the Notes section. Use this section to provide an explanation for your recommendation, including your recommended land use designation change and/or zone change, and to add any other information that you think would be useful.*
4. *Review surrounding parcels and identify additional candidates for land use and zone changes. Be surgical. For each parcel, please consider the following:*
 - a. *Is it necessary to redesignate the parcel to H30, H50, H100, H150, MU, CG, or CM to avoid spot designating/zoning?*
 - i. *Is the parcel surrounded by existing multifamily residential uses?*
 - ii. *Are there nearby (same block, same neighborhood, etc.) parcels that have recently (around last five years) been (re)developed into a multifamily residential use? What about recent approvals? Pending cases?*
 - iii. *Is the parcel located within a special management area or subject to additional regulations that will limit development?*
 - iv. *Is the site supported by water, sewer, and dry utilities (electric, gas, telecommunications, television, cable)?*
 - b. *Is it necessary to also rezone the parcel?*
 - i. *Is the zoning inconsistent with the new land use designation?*
 - ii. *Is the zoning consistent but not well aligned with the new land use designation?*
 - c. *What is the existing use?*
 - i. *Verify the existing use. Start with the Assessor's land use description.*
 - ii. *Check to see if the use(s) is legally established. Check building permit data, planning approvals.*
 - iii. *Check to see if there is a recent approval or pending case for the parcel.*
 - d. *What is the history of the parcel?*
 - i. *Check GIS-NET for past land use designation and zoning.*
 - ii. *Was the parcel ever the subject of a project-based plan amendment or zone change?*
 - iii. *Was the parcel part of a recent comprehensive planning or rezoning effort?*
 - e. *If necessary, use any other information and/or do a site visit to make your determination. Document this in the Notes section in the mapping application, and save any files (e.g., copies of approved or pending plans, building permits, or photographs you took during site visit) in the appropriate folder.*
5. *In the mapping application, click on a parcel, or use the Batch Attribute Editor to select multiple parcels, and select REZONING or FLAG.*

REZONING: I recommend that this parcel be redesignated to H30, H50, H100, H150, MU, CG, or CM; and/or I recommend that this parcel be rezoned.

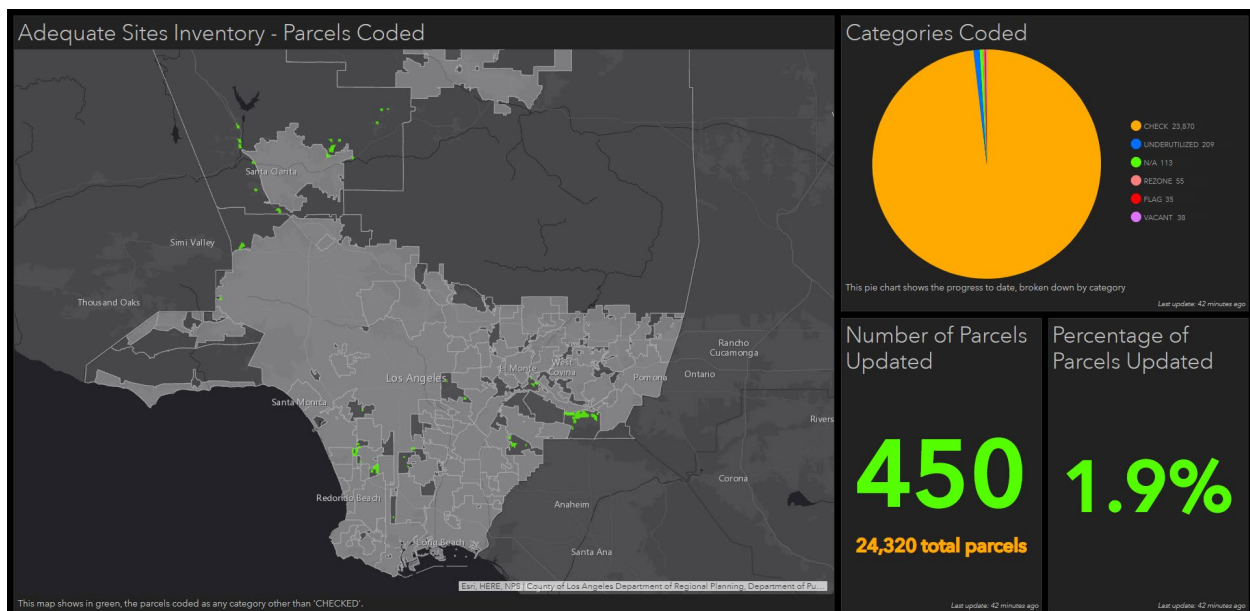
FLAG: I think this parcel should be redesignated to H30, H50, H100, H150, MU, CG, or CM; and/or I think this parcel should be rezoned, but I believe it needs further review. Or, I think this parcel should be redesignated to H30, H50, H100, H150, MU, CG, or CM; and/or I think this parcel should be rezoned, but there is a pending case or a recent approval that needs to be considered.

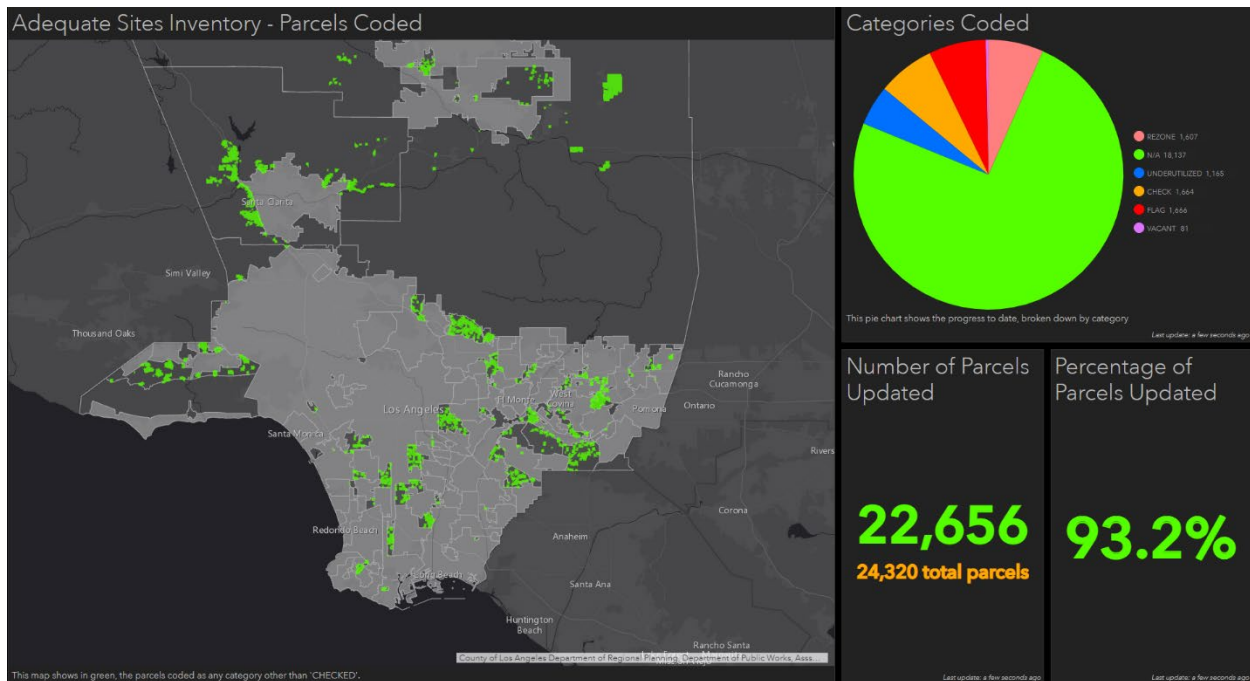
6. After making your selection (REZONING, N/A, or FLAG) in the drop-down list, add to the Notes section. Use this section to provide an explanation for your recommendation, and any other information that you think would be useful.

Dashboard

As the volunteer planners were making their edits, a dashboard was developed so that DRP staff could see, in real time, the progress being made during the first round of parcel review. The screenshots in **Figure G-3** below indicate the percentage of categories coded and how far along overall staff was in making the edits.

Figure G-3: Web Mapping Application Dashboard





Sites Inventory: Further Refinement

In general, the Sites Inventory includes vacant and underutilized sites that were reviewed and manually selected by the volunteer planners to accommodate the Lower Income RHNA, as these sites all allow at least 30 units per acre pursuant to Government Code section 65583.2 (c)(3)(B)(iv). DRP staff then further reviewed the recommendations by the volunteer planners and determined to only include sites that meet all of the following for the Lower Income RHNA:

- The site is not in a Special Management Area (SMA) Class II or III of the General Plan Hazard, Environmental, and Resource Constraints Model.¹³ SMA Class II and III include various moderate and severe hazard, environmental, and resource constraints on development, including, but not limited to:
 - FEMA 100-year Flood Zone;
 - Significant Ecological Areas;
 - Sensitive Environmental Resource Areas;
 - Active Fault Trace;
 - Seismically Induced Landslide Zone;
 - Hillside Management Areas with 50 percent or greater slope;

¹³ See Appendix C of the General Plan for more information on the Hazard, Environmental, and Resources Constraints Model: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-appendices.pdf

- Agricultural Resource Areas; and
- The site is not in a Moderate, High, or Very High Fire Hazard Severity Zone.

In addition, DRP staff selected additional sites that allow less than 30 units per acre (mostly vacant) to accommodate the Moderate and Above Moderate Income RHNA. All of these sites are at least 5,000 sq. ft. in size since the minimum lot size (i.e., required area) in the zones that permit residential uses is generally 5,000 sq. ft. Sites selected to accommodate the Moderate Income RHNA are located within the South Los Angeles or Antelope Valley submarket area, as identified in the Inclusionary Housing Ordinance.¹⁴ The analyses in the Inclusionary Housing Feasibility Study indicate that market-rate rental and for-sale housing within these submarket areas are generally affordable to moderate income households. More information on the Sites Inventory for the Moderate and Above Moderate Income RHNA can be found in the Resources section of the Housing Element.

Part II – Selecting Sites for Rezoning

During the preliminary assessment by the volunteer planners, it was found that parcels less than 0.5 acres in size should also be considered as part of the rezoning site selection because there were not enough sites recommended by the volunteer planners for rezoning from the initial list of parcels between 0.5 acres and 10 acres in size. Also, additional lot consolidation incentives could also be added as part of the Rezoning Program or as a separate Housing Element implementation program (i.e., Program 21: Incentives for Lot Consolidation), making sites that are less than 0.5 acres in size more likely to be redeveloped into housing in the near future.

In July 2020, the GIS team was tasked to compile a list of parcels less than 0.5 acres in size using the same locational criteria that were used to generate the initial list of parcels for the preliminary assessment.

GIS Modeling

The GIS models that were built for the initial list of parcels between 0.5 acres and 10 acres in size were utilized again for the list of parcels less than 0.5 acres in size. Some modifications were made to some inputs and outputs; but ultimately, the final GIS layer for parcels less than 0.5 acres was generated. Over 192,000 parcels were generated from this output.

Rezoning: New Methodology for Site Selection

Once the preliminary assessment was completed by the volunteer planners and the Sites Inventory was refined by DRP staff, a new methodology was developed to identify potential sites for rezoning among 1) the newly added less-than-half-acre parcels, and 2) parcels that were not selected for the Sites Inventory. Specifically, this new methodology comprised of two components: 1) a scoring system to identify clusters of parcels that were ranked as the most ideal for rezoning, and 2) a set of criteria

¹⁴ https://planning.lacounty.gov/assets/upl/project/housing_la_ahap_appendixE.pdf
https://planning.lacounty.gov/assets/upl/project/iho_supplemental-analysis.pdf

to evaluate the availability of individual parcels for housing development within those clusters and to determine whether the individual parcels can count toward the Lower Income RHNA shortfall.

Scoring System

As shown in **Table G-1**, scores were established under seven categories: parcel location/proximity, infrastructure, natural constraints, development potential, economic mobility, environmental justice, and transportation. All but one of the categories (infrastructure) included a set of scores established on a relative scale, comparing the level of significance or preferability under each category. Scores in most of these categories were established on a scale of 1 to 10. For example, under the transportation category, sites within a quarter mile of a High Quality Transit Area (HQTa) were given eight points, compared to sites outside of the quarter-mile distance but within a half-mile radius, which received seven points as they were slightly less preferable for rezoning because they are not as close to an HQTa. However, these are both less preferable than sites within a Transit Oriented District (TOD). The establishment of the TODs was a major land use strategy in the General Plan,¹⁵ and sites in the TODs received the highest score possible (10 points) in the transportation category as there are or will be “built-in” incentives for higher-density housing development in the TOD specific plans (e.g., Program 2: Florence-Firestone Transit Oriented District Specific Plan). There are also several zoning and CEQA incentives available through State law for projects located near transit.

Similarly, under the parcel location/proximity category, sites in Transit Centers (9 points), Neighborhood Centers (10 points), and Corridors (10 points) were given higher scores since these areas were identified in the General Plan as opportunity areas with housing and infill development opportunities, and future community-based planning efforts, such as Programs 7, 18, 19, and 20 (the area plans), will further study and develop additional incentives to encourage higher-density housing development in these opportunity areas.¹⁶ On the other hand, sites located in the Industrial Flex Districts identified by the General Plan had 10 points deducted under this category, since these are existing industrial areas where, despite the current mix of industrial and non-industrial uses, housing development is unlikely to occur in the near future.

Also, in order to affirmatively further fair housing through the rezoning effort, the scale under the economic mobility and environmental justice categories were adjusted, with 15 points being the highest possible score under each of these categories instead of 10 points. Specifically, to meet the goal of encouraging access to opportunity and to prevent further segregation and concentration of poverty, sites located in areas with the most resources and opportunities in terms of educational attainment, employment, and economic mobility as identified by the California Tax Credit Allocation Committee (TCAC) received the highest score (15 points) under the economic mobility category. Similarly, under the environmental justice category, sites located in areas that are least burdened by pollution received the highest score (15 points). For this category, the scoring system incorporated data from the Environmental Justice Screening Method (EJSM) tool, which is a mapping application developed by the County in partnership with University of Southern California and Occidental

¹⁵ <https://planning.lacounty.gov/tod/>

¹⁶ See General Plan Chapter 5: Planning Areas Framework for more information on the opportunity area types in various planning areas: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch5.pdf

College.¹⁷ EJSJ illustrates cumulative health risks by identifying areas that are disproportionately burdened by and vulnerable to multiple types of pollution. Sites with the highest EJSJ score are the most vulnerable to pollution, and thus received no points under this category. In addition, points were deducted on sites that are within 500 feet of a freeway or railway.

Table G-1: Scoring System, Rezoning Suitability

Category	Scores
Parcel Location/Proximity	
Sites are scored based on proximity to uses and/or amenities that support housing as well as lot consolidation potential. Sites within industrial areas also have points deducted.	
Within, or partially within, a Neighborhood Center (per General Plan)	10
Within, or partially within, a Corridor (per General Plan)	10
Within, or partially within, a Transit Center (per General Plan), which is not currently a Transit Oriented District	9
Within ½ mile of parcels designated by the General Plan for multifamily, commercial, or mixed-use (H30+)	7
Within ½ mile of existing multi-family residential uses	5
Within an Economic Opportunity Area	5
Parcel adjacent to lots with same owner	2
Within, or partially within, an Industrial Flex District	-10
Infrastructure	
Sites within a water and/or sewer district receive additional points.	
Served by public water, sewer, or utilities	6
Natural Constraints	
Sites are scored based on whether they are within a Special Management Area (SMA) that has Hazard or Environmental Constraints as identified in the General Plan (severity ranking from lowest to highest in Classes 1 - 3).	
No SMA	10
SMA Class 1	8
SMA Class 2	-8
SMA Class 3	-10
Development Potential	
Sites get a higher score where there is more development potential.	
Fronts a highway or public street, or is not landlocked	9
Land to Improvement Ratio is greater than 1, which indicates that the land is more valuable than the structures on-site	8
Within a Community Standards District (CSD) with less restrictive development standards	3
Within a Community Standards District (CSD) with more restrictive development standards	-1
Economic Mobility	
Sites get a higher score if located in areas with more resources and opportunities in terms of educational attainment, employment, and economic mobility.	
TCAC High or Highest Resource Area	15

¹⁷ <https://planning.lacounty.gov/greenzones/ejsj>

Category	Scores
TCAC Moderate Resource Area	10
TCAC Low Resource Area or High Segregation and Poverty	0
Missing/Insufficient Data	0
Environmental Justice	
Sites get a higher score if located in areas that are less burdened by pollution.	
EJSM Score 0-4	15
EJSM Score 5-9	10
EJSM Score 10-14	5
EJSM Score 15+	0
Within 500 ft of a freeway	-4
Within 500 ft of a railway	-3
Transportation	
Sites get a higher score if in proximity to transit.	
Within a TOD	10
Within ¼ mile of existing or planned HQTA (not within a TOD or Transit Center)	8
Outside ¼ mile but within ½ mile of existing or planned HQTA (not within a TOD or Transit Center)	7

Under each category, points were added or deducted on each candidate parcel. Points from the categories were then combined to generate the total score, which was used to rank a parcel's suitability for rezoning. Since 59 was both the average and the median total score, only areas with a significant clustering of parcels with a total score greater than 59 were considered more suitable for rezoning and selected for further review. The screenshots below (**Figure G-4**) illustrate how these total scores reveal higher scoring clusters. The image on the left shows all the data, whereas the image on the right shows all parcels with a total score greater than 59:

Figure G-4: Parcels Unfiltered and Filtered by Weighted Score (Sample Images)



Proposed Land Use Designation and Zoning

Once the clusters of parcels with a total score greater than 59 were identified, the next step was to assign a proposed land use designation on these parcels. This step was critical in the rezoning site selection process as the maximum density allowed by the proposed land use designation would be used to calculate the net development potential on a candidate site. The net development potential would then be used as one of the criteria to determine whether the site, once rezoned, could count toward the Lower Income RHNA, since Government Code section 65583.2(h) requires that each site selected for rezoning to accommodate the Lower Income RHNA shortfall must have the capacity to accommodate a minimum of 16 additional units. The proposed land use designation also dictates whether the candidate site would count toward the Lower Income RHNA shortfall, since Government Code section 65583.2 (c)(3)(B)(iv) allows the County of Los Angeles to use 30 units per acre as a proxy for lower income affordability, and Government Code section 65583.2(h) requires that sites rezoned for the Lower Income RHNA shortfall must allow a minimum of 20 units per acre. In general, if a candidate site was considered ideal for rezoning due to its relatively higher total score, but did not meet one of these criteria pertaining to the net development potential or the allowable density as specified in the Government Code, the site would then be used to accommodate the Moderate or Above Moderate Income RHNA shortfall depending on the Inclusionary Housing submarket area. Additional criteria and thresholds were also used to determine the suitability of a candidate site for the Lower Income RHNA shortfall, which are explained in greater detail in the next section.

In most cases, it was assumed that if rezoned, the proposed land use designation would be one category above the existing land use designation according to the General Plan Land Use Legend. For example, if a parcel is currently designated H18 (0-18 du/ac), the proposed land use designation would be H30 (20-30 du/ac). The net development potential was then estimated per parcel based on the maximum allowable density under the proposed land use designation, with density bonus (if applicable) and discounting factor added as described in the Resources section of the Housing Element. In determining the net development potential, contiguous parcels under the same ownership were assumed to have the potential for consolidation.

Once the proposed land use designation was selected, a corresponding zone was then identified for each rezoning candidate parcel as shown in **Table G-2** below:

Table G-2: Proposed Land Use Designation and Corresponding Zones

Proposed Land Use Designation	Proposed Zoning (If Applicable)
H18 – Residential 18 (0-18 dwelling units/acre)	R-2 – Two-Family Residence
	RLM-1 – Residential Low-Medium 1 (Pending Florence Firestone TOD Specific Plan)
H30 – Residential 30 (20-30 dwelling units/acre)	R-3 – Limited Density Multiple Residence
	RLM-2 – Residential Low-Medium 2 (Pending Florence Firestone TOD Specific Plan)

Proposed Land Use Designation	Proposed Zoning (If Applicable)
H50 – Residential 50 (20-50 dwelling units/acre)	R-4 – Medium Density Multiple Residence
H100 – Residential 100 (50-100 dwelling units/acre)	R-5 – High Density Multiple Residence
CG – General Commercial (20-50 dwelling units/acre)	C-1 – Restricted Business C-2 – Neighborhood Commercial C-3 – General Commercial C-H – Commercial Highway
MU – Mixed Use (50-150 dwelling units/acre)	MXD – Mixed Use Development

Lower Income RHNA Eligibility Analysis

Clusters of parcels that were identified as ideal for possible rezoning with a total score greater than 59 were further filtered down in order to identify sites that meet the additional criteria for the Lower Income RHNA shortfall. Two sets of filters were developed for this analysis: 1) site location and 2) site condition.

First Set of Filters – Site Location

A potential rezoning site for the Lower Income RHNA shortfall must meet all of the following:

- Is not currently designated Mixed Use (MU – 50-150 du/net ac) in the General Plan, as MU is the land use designation that allows the highest density in the General Plan Land Use Legend;
- Is not currently designated Residential 9 (H9 – 0-9 du/net ac) in the General Plan (or an equivalent land use designation in an Area or Community Plan), or any other land use designations that allow less than 9 units per net acre;
- Is not in the Santa Clarita Valley or the Antelope Valley;
- Is not in a Special Management Area (SMA) Class II or III of the General Plan Hazard, Environmental, and Resource Constraints Model;
- Is not in a Coastal Zone;
- Is not in a Moderate, High, or Very High Fire Hazard Severity Zone;
- Fronts on a public right-of-way;
- Is not in a Hillside Management Area;
- Is not in the 65 or above dB CNEL noise contour of an Airport Influence Area;

- Is not in an area covered by a specific plan; and
- Is within a water or a sewer district boundary, or with access to dry utilities.

Second Set of Filters – Site Condition

A potential rezoning site that meets all the criteria would then be checked against the second set of filters focusing on the suitability of individual parcels within a potential rezoning cluster. Only parcels that meet all applicable thresholds in **Table G-3** were selected for rezoning to accommodate the Lower Income RHNA shortfall:

Table G-3: Site Condition Analysis, Lower Income RHNA Eligibility for Rezoning

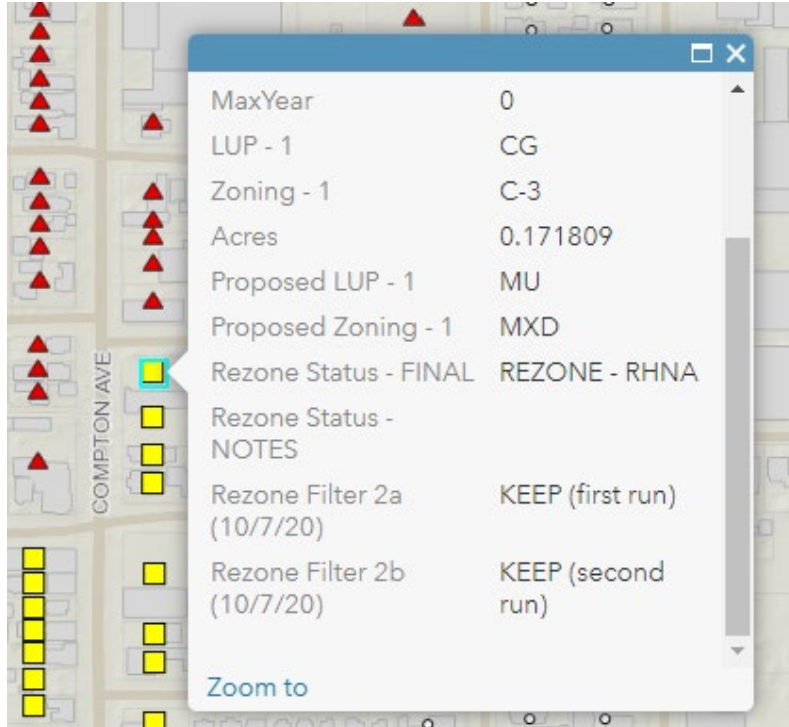
Threshold	Reason
For All Sites	
Site must have the capacity to accommodate a minimum of 16 additional units.	As required by Government Code section 65583.2(h).
Site is not currently developed with one of the following uses: cemetery, park, landfill, military-related use, pumping facility, sewage treatment, substation, other utility-related use, water tank, hospital, school, or gas station.	These sites either have uses that are unlikely to be discontinued or require extensive clean-up due to the existing uses. These sites are, therefore, unlikely to be redeveloped into housing in the near future.
Site does not have an active, open or pending status in one of these databases: the Cortese List, Envirostor, Geotracker, and the Resource Conservation and Recovery Act.	These sites likely require extensive clean-up due to known contamination and are unlikely to be redeveloped into housing in the near future.
For Sites with Non-Residential Uses (Existing or Proposed)	
Existing building(s) must be at least 20 years old. For sites with multiple buildings built during different times, use the most recent “year built” from the Assessor’s data as the filter.	Discussions with market economists indicate that non-residential buildings, especially retail spaces that age (20+ years) are outdated and hard to remodel to meet modern demands.
Site must not have a pending or recently approved planning entitlement (since July 2018) for a non-residential use.	Sites with a pending or recently approved planning entitlement for a non-residential use are unlikely to be redeveloped into housing in the near future.
Site must not have a recently issued building permit (since July 2018) for a new or refurbished structure for a non-residential use.	Sites with a recently issued building permit for a non-residential building are unlikely to be redeveloped into housing in the near future.
For Sites with Residential Uses (Existing or Proposed)	
Site is not currently developed with condominiums or PUDs (planned unit development). Filter out sites with the suffix “C” or “D” in the Assessor Use Code.	Condo properties or PUDs involve multiple owners and future housing redevelopments are unlikely due to the common ownership.
Existing building(s) must be at least 50 years old. For sites with multiple buildings built during different times, use the most recent “year built” from the Assessor’s data as the filter.	Residential buildings over 30 years old usually require major systems upgrades, and the sites are therefore more likely to be redeveloped. In neighborhoods with older, but well-maintained buildings, using the 50-year mark as the threshold is more appropriate.
The maximum number of units permitted by the proposed land use designation must be at least twice the existing number of units.	In most cases, housing developers are less likely to redevelop a site with existing residential uses unless there will be a substantial increase in the unit counts.

Threshold	Reason
Site must not have a pending or recently approved planning entitlement (since July 2018) for a residential use.	Some sites with an entitled but not yet permitted housing project are already included as part of the RHNA strategy – see the Select Entitled Projects section in the Housing Element for more details. Also, it is more conservative to assume that developers that have recently obtained or will soon obtain planning entitlements for their proposals will likely pursue their projects as planned without further modifications, even if the proposed land use designation may allow more units than what they are currently proposing/entitled to.
Site must not have a recently issued building permit (since July 2018) for a new or refurbished structure for a residential use.	It is more conservative to assume that developers that have recently obtained a building permit for their proposals will likely pursue their housing projects as permitted without further modifications, even if the proposed land use designation may allow more units than what they are permitted. Also, some of these projects are currently under construction or recently obtained the certificate of occupancy, making the sites unlikely to be redeveloped into another new housing project.

GIS Modeling

The GIS model ran the data layers through these two sets of filters in order to identify sites that could be considered for the Lower Income RHNA, as shown in **Figure G-5**.

Figure G-5: Application of Filters for Lower Income RHNA Eligibility (Rezoning)

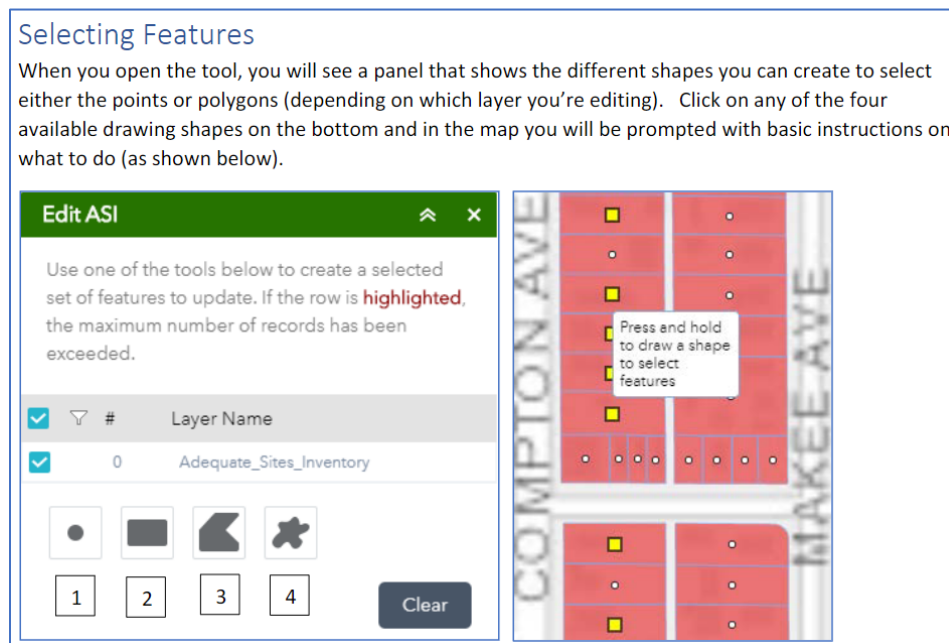


Web Mapping Application and Quality Control

Once the two sets of filters were run, the candidate parcels were published as layers in ArcGIS Enterprise and added to a newly created web mapping application. This mapping application was used by the DRP staff to conduct quality control and finalize the Rezoning Program. For example, in reviewing a potential rezoning cluster, if a parcel that was already in the Sites Inventory was found within the cluster, the site would then be removed from the Sites Inventory and checked against the two sets of filters used on the rezoning candidate sites for the Lower Income RHNA eligibility analysis described above. If the site meets all criteria in the first set of filters (site location), but did not meet all applicable criteria in the second set of filters (site condition), in most cases, the site would then be included in the Rezoning Program for the Moderate or Above Moderate Income RHNA – as long as it is at least 5,000 sq. ft. in size, since 5,000 sq. ft. is generally the minimum lot size (i.e., required area) in the zones that permit residential uses. Also, similar to the site selection process for the Sites Inventory, only sites that are within the South Los Angeles submarket area, as identified in the Inclusionary Housing Ordinance, were selected to be rezoned for the Moderate Income RHNA.

A detailed tutorial was created by DRP staff to edit one or many sites at a time and code them appropriately. Samples from that tutorial are shown in **Figure G-6** below:

Figure G-6: Tutorial for Editing Adequate Sites Inventory and Rezoning Sites



Rezone / RHNA points layer

After making your selection, you can select enter your Status update and any notes, then hit the 'Save' button. In this case we are updating some of the 'REZONE' points to 'REZONE – TO ADD' to 'fill in the gap' between the RHNA points to prevent spot zoning. After you update the points, you'll see there are red triangles now. These are the points that will be sent to the EIR Consultant along with the RHNA eligible sites.



Methodology Note

It should be noted that the steps outlined in this Part were not necessarily a linear process. There were some slight changes in methodology as data layers were produced and used by DRP staff in the web mapping application. For example, there were originally more categories in the scoring system, but ultimately, it was decided that some of these categories should be used as filters on the rezoning candidate sites for the Lower Income RHNA eligibility analysis because these factors were less about whether an area is ideal for rezoning, but rather, whether a parcel is likely to be redeveloped into housing in the near future. These refinements required the GIS models to be re-run and the data layers to be re-published for the mapping application. This is typical of most large-scale GIS analyses, which is why the models were so valuable as it allowed for this flexibility of change. Furthermore, other refinements during this stage of the rezoning site selection process, particularly for sites that would accommodate the Moderate and Above Moderate Income RHNA, included components that were outside of the steps described in this Part. For example, there are sites in the unincorporated communities of South Whittier-Sunshine Acres and West Whittier-Los Nietos where the existing land use categories allow multifamily residential uses, yet these sites are currently zoned A-1, R-1, and R-A, none of which allow multifamily residential uses by-right. The rezoning program will correct the zoning

to align with the land use policy, and these sites were included in the rezoning program to accommodate the Above Moderate Income RHNA.

Part III – Outreach and Refinement of the Rezoning Program to Address Public Comments

DRP conducted a series of outreach meetings and constructed a GIS Story Map to facilitate the review of the proposed rezoning program. The Story Map promoted transparency with the draft data and helped to explain the site selection process in a user-friendly way. This approach also generated community-specific feedback that required further modifications to the data.

Story Map

Using ESRI's latest Story Map serves as a great communication device to stakeholders. It is a multi-media mapping application which allows the presenter to illustrate a very complex project or process using images, infographics, short captions, videos, static maps and interactive maps to communicate the findings and recommendations. In this Story Map, the Housing Element Update process was explained through maps and imagery using plain language, along with interactive maps that allowed the user to zoom in to an area of interest, or an address, and get specific information about where Rezoning is occurring in their community. The screenshots in **Figures G-7** through **G-10** below illustrate some key features of the Story Map. Additionally, a Spanish language version was created.

Figure G-7: Story Map Image, Housing Types

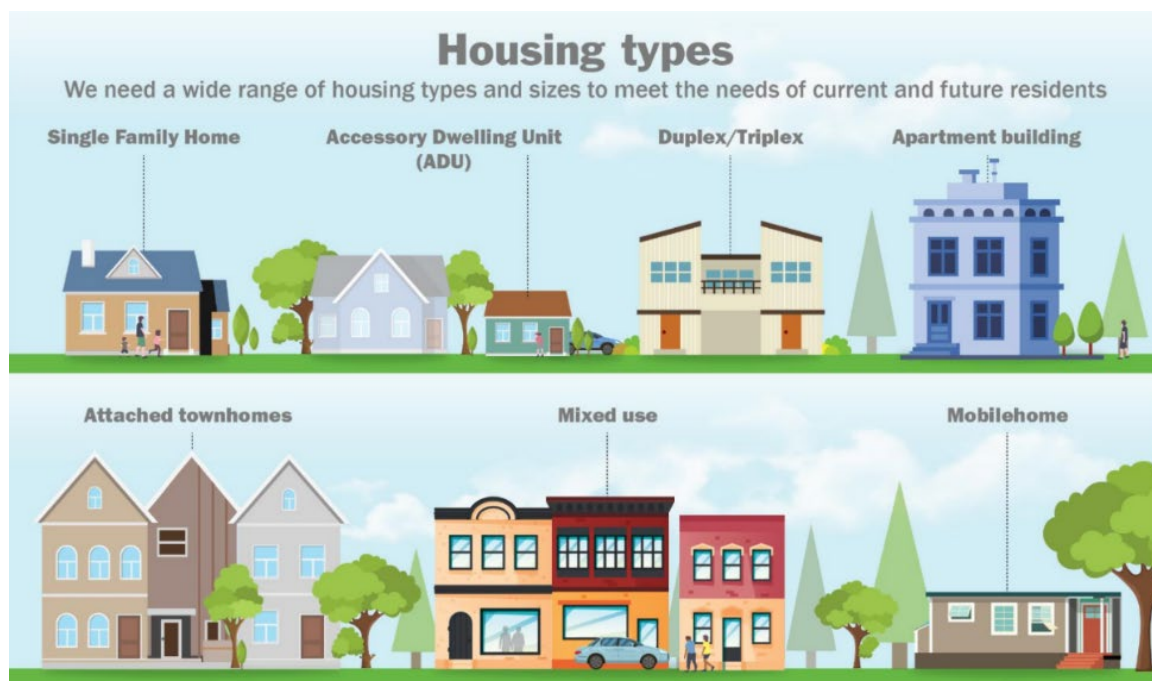


Figure G-8: Story Map Image, RHNA Information

The foundation for the Housing Element is the Regional Housing Needs Allocation (RHNA), in which the State estimates each region’s housing needs for the upcoming eight years. State law requires each city and county to plan for the estimated number of homes for its current and future residents through land use and zoning regulations. These regulations include the number of homes per acre that are allowed on a parcel, and the allowable housing types (such as single-family homes, apartments and townhouses).

The RHNA for the unincorporated areas for 2021-2029 is approximately 90,000 homes, which is the largest number the County has ever had. *Neither property owners nor the County are required to build these housing units.*

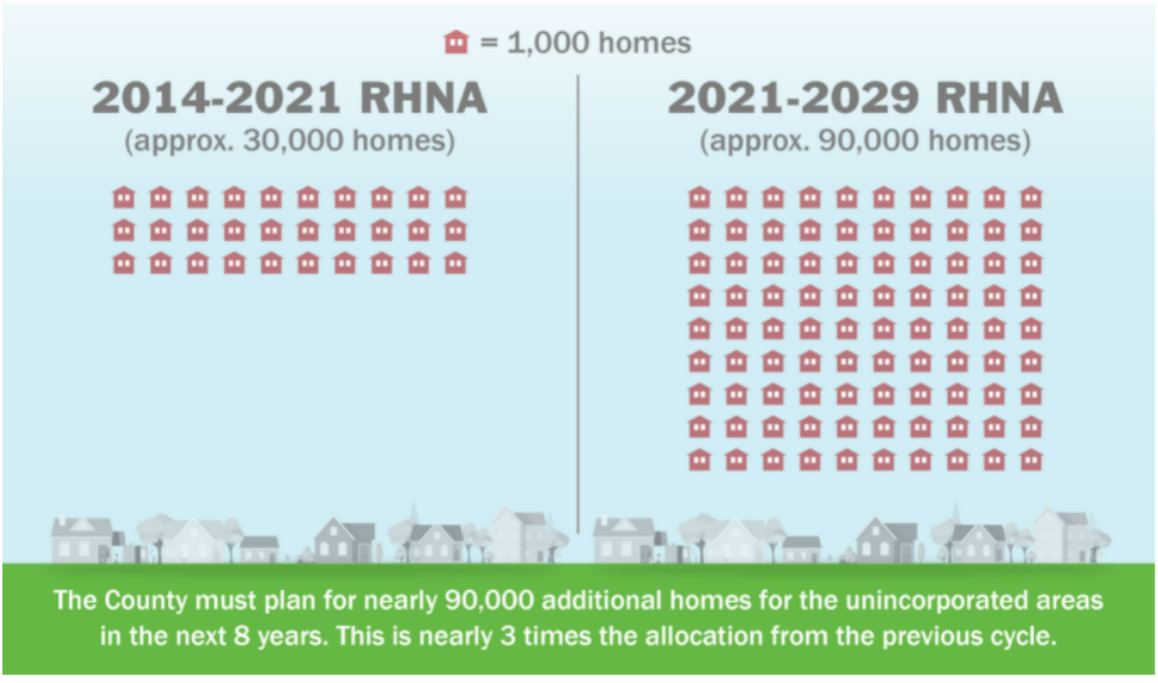


Figure G-9: Story Map Image, Environmentally Sensitive and Naturally Constrained Areas

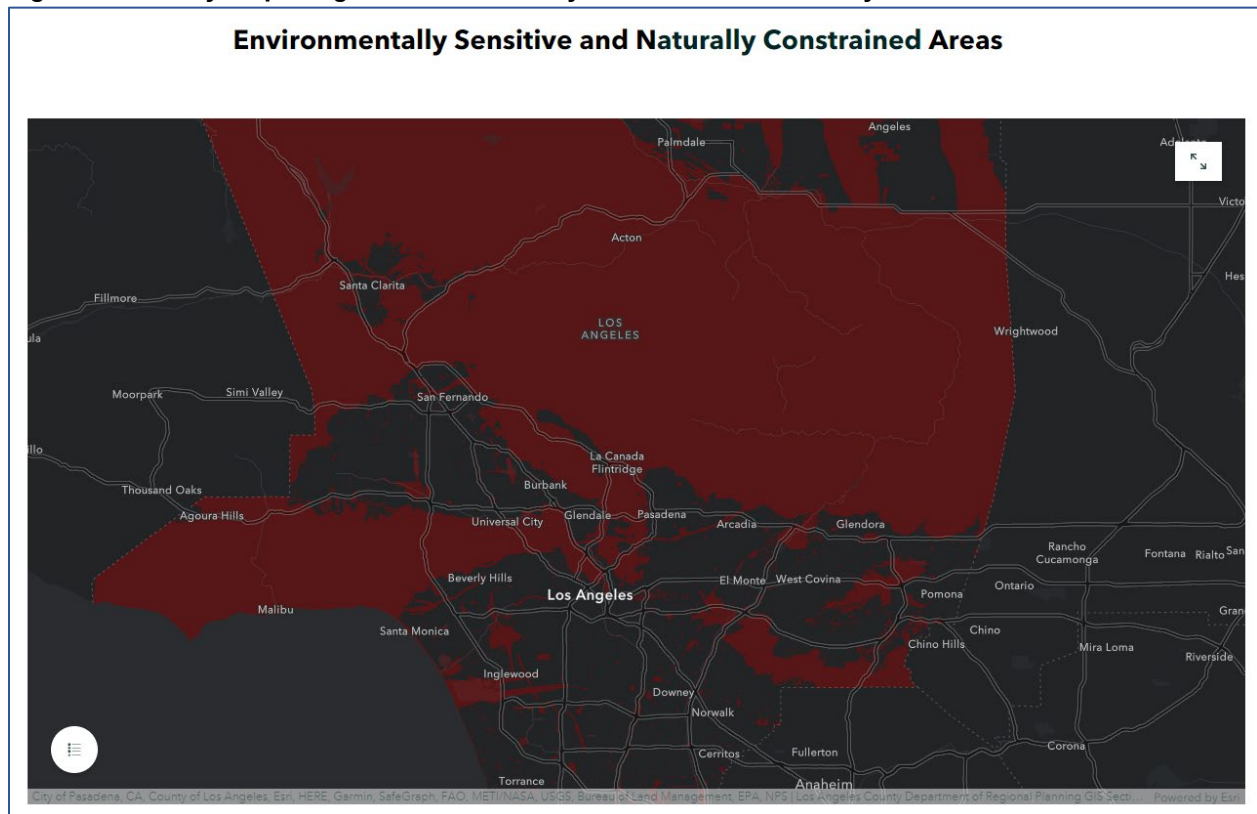
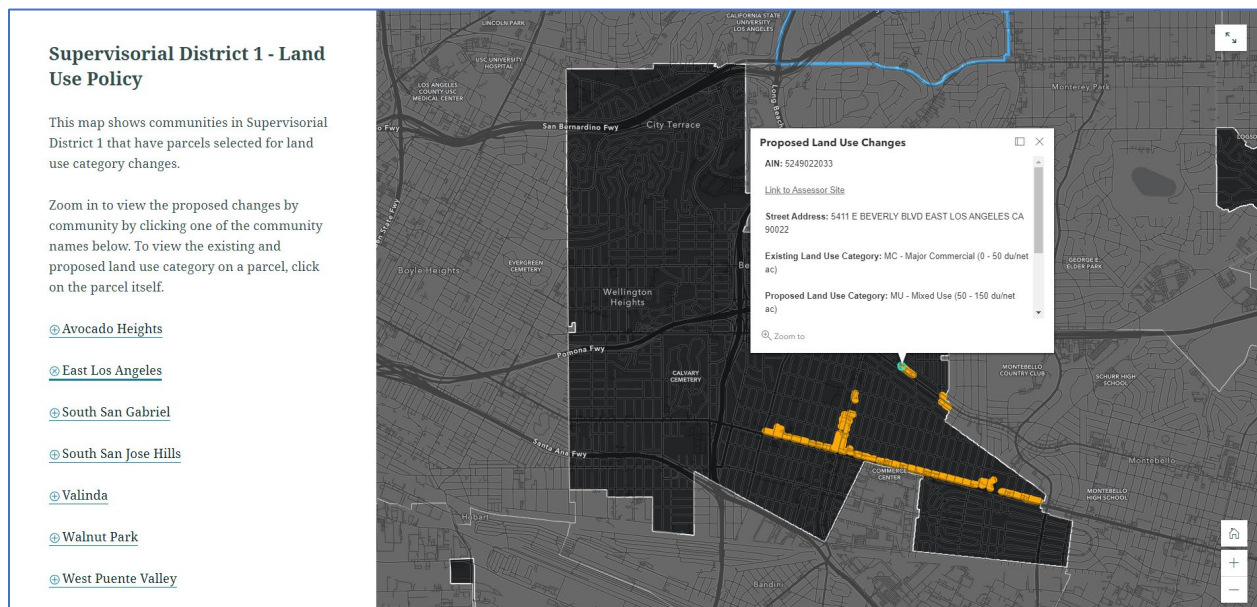


Figure G-10: Story Map Image, Proposed Land Use Changes



Feedback and Ad Hoc Analyses

One of the results of the outreach, and, specifically, the Story Map was some additional modifications and refinements to the proposed land use policy and zoning maps. Stakeholder comments were accommodated with some additional analyses and updates to the Sites Inventory and Rezoning GIS layers. In some cases, community members recommended alternative sites to be included in the Rezoning Program, even though these sites might not have a high score to be considered ideal for rezoning. Because community members have more up-to-date local knowledge about their own neighborhoods, this kind of public feedbacks helped improve the overall quality of the Rezoning Program. DRP staff communicated these changes with the GIS team to make these changes and re-publish the online layers when necessary.

Part IV – Final Adjustments of the Rezoning Program for the Moderate and Above Moderate RHNA

Once the Sites Inventory and the Rezoning Program were finalized following the steps and methodology described, it was found that together with the other RHNA strategies – namely, projected accessory dwelling units (ADUs) development, entitled residential projects, anticipated number of units in specific plan areas, and County-owned sites in cities – there was a surplus of extremely low/very low- and low-income units, but a shortfall of moderate- and above moderate-income units. To ensure that there would be no deficit under each income category after the Rezoning Program is completed, adjustments were made to reassign the level of affordability on some rezoning sites. While Government Code section 65583.2(c)(3) allows the County to use 30 units per acre as a proxy for lower income affordability, sites allowing this density once rezoned could instead be used to accommodate the Moderate or Above Moderate Income RHNA. As such, DRP developed a new methodology to reassign the level of affordability on certain sites in the Rezoning Program based on two considerations:

1. As it is more financially feasible for larger projects to provide affordable units, the reassignment of units from the lower income categories (very low and low income) to the higher income categories (moderate and above moderate) should start with the smallest sites in the Rezoning Program; and
2. Only sites located in the South Los Angeles submarket area as identified in the Inclusionary Housing Ordinance can count toward the Moderate Income RHNA.

Table G-4 shows the adjusted unit counts for each income category.

Table G-4: Shortfall and Surplus, Before and After Rezoning

	Extremely Low/Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
Shortfall without Rezoning	-16,393	-4,357	-9,019	-26,005	-55,774
Rezoning	16,526	4,480	9,250	26,092	56,348
Surplus after Rezoning	133	123	231	87	574