

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

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



April 25, 2022

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

Dear Amy Bodek:

RE: County of Los Angeles 6TH Cycle (2021-2029) Draft Housing Element

Thank you for submitting the County of Los Angeles (County) revised draft housing element update received for review on April 8, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on April 19, 2022 with Connie Chung and Tina Fung, Planning Department.

The revised draft element meets the statutory requirements described in HCD's February 28, 2022 review. This finding was based on, among other reasons, a complete sites inventory and analysis including analysis of nonvacant sites and programs to affirmatively further fair housing (AFFH). As a result, the revised element will comply with State Housing Element Law (Article 10.6 of the Gov. Code) when the revisions are adopted and submitted to HCD, pursuant to Government Code section 65585.

In addition, for your information, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, which triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period. While the resolution of adoption includes the appropriate findings, changes to the analysis should be reflected in future re-adoption of the element.

Moreover, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), as the County failed to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), Program 17 (Adequate Sites for RHNA) and Program 9 (Inclusionary Housing Feasibility and Implementation) must be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element

will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

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

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

HCD appreciates the hard work and dedication of Connie Chung, Assistant Administrator, and Tina Fung, Supervising Regional Planner, provided throughout the housing element review. We are committed to assist the County in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Sohab Mehmood, of our staff, at Sohab.Mehmood@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager