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Community Planning and Development
Pathways to Removing Obstacles to Housing (PRO Housing)

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Proposal for the County of Los Angeles

PUBLIC REVIEW DRAFT 10/6/23

Table of Contents

EXHIBIT A Executive Summary.....2
EXHIBIT B Threshold Requirements and Other Submission Requirements.....4
EXHIBIT C Need6
EXHIBIT D Soundness of Approach.....12
EXHIBIT E Capacity34
EXHIBIT F Leverage38
EXHIBIT G Long-Term Effect.....40
ATTACHMENTS/FORMS.....43

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EXHIBIT A Executive Summary

County of Los Angeles

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The vision for the County of Los Angeles' proposal for the PRO Housing Grant is to enable increased production and preservation of affordable housing across a broad and diverse geographic area over a sustained timeframe through activities related to **Infrastructure Planning, Transit Oriented Districts, and Equity/Fair Housing.**

Infrastructure Planning: The County of Los Angeles (County) is undergoing an ambitious program to rezone sites for over 56,000 by-right residential units, approximately half of which is affordable to Low-Moderate Income (LMI) households, by the end of 2024. This rezoning strategy is supported by the development of multiple area plans, which are comprehensive land use plans for clusters of unincorporated communities throughout Los Angeles County. The preparation of capital improvement plans (CIPs) that prioritize new infrastructure and improvements to existing infrastructure is a significant opportunity to support the affordable housing created through these area plans. The CIPs will, at a minimum, focus on sewer and transportation facilities, given the direct impacts to housing costs; but can include water, stormwater, dry utilities, recreational and open space, and other infrastructure, based on the unique needs and characteristics of each planning area. The following are proposed activities: East San Gabriel Valley Planning Area CIP; Gateway Area Plan and Gateway Planning Area CIP; Metro Planning Area CIP; South Bay Planning Area CIP; West San Gabriel Valley Planning Area CIP; and Westside Planning Area CIP.

Transit Oriented Districts: Transit Oriented Districts (TODs) are areas that are supported by major public transit infrastructure and have opportunities for a mix of higher intensity development, including multifamily housing, employment and commercial uses; design; compact development; and improvements that promote living streets and active transportation, such as trees, lighting, and bicycle lanes. Because of their scale, TODs also provide opportunities to implement focused affordable housing policy tools, such as value capture, to increase residential densities, strengthen anti-displacement policies, and garner community benefits. By coordinating increased residential densities with transportation, parking, community-serving uses and amenities, with an emphasis on pedestrian and bicycle safety, TODs can also create a welcoming, safe environment and contribute to mobility goals. The following are proposed activities: East Los Angeles TOD Specific Plan Update and East Pasadena-East San Gabriel TOD Specific Plan.

Equity/Fair Housing: Past systemic racism and discriminatory housing practices, including the use of redlining maps and restrictive housing covenants, have not only resulted in long-term inequality, but have shaped the physical environment and significantly influenced the residential land use patterns that we know today. While many past practices of systemic racism have been discontinued or eliminated, they may still manifest in less overt ways, such as exclusionary policies in zoning codes and the siting of nuisance land uses adjacent to lower income residential communities. Removing these barriers and affirmatively furthering fair housing are important strategies to reversing land use patterns and unraveling the legacy of past systemic racism and combatting the systemic racist policies that persist today. The following are proposed activities: Missing Middle and Gentle Density Housing Program and Equity Audit.

EXHIBIT B Threshold Requirements and Other Submission Requirements

County of Los Angeles

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This proposal, submitted by the County of Los Angeles, meets all threshold requirements and other submission requirements for the PRO Housing grant.

- **Outstanding Civil Rights Matters to be Resolved:** None.
- **Standard Application, Assurances, Certifications and Disclosures**
 - Standard Form 424 (SF-424) Application for Federal Assistance
 - Assurances (HUD 424-B)
 - Applicant Disclosure Report Form 2880 (HUD 2880)
 - 424-CBW budget form
 - Certification Regarding Lobbying
 - Disclosure of Lobbying Activities (SF-LLL)
- **Eligible Applicant:** The County of Los Angeles is a county government and is therefore eligible to submit this grant proposal. It is confirmed that this is the only application being submitted by the County of Los Angeles.
- **Code of Conduct:** The County complies with the Code of Conduct written standards of conduct submitted by the Los Angeles County Development Authority (LACDA), which have previously been submitted and is on file on the Code of Conduct for HUD Grants Program webpage.
- **Affirmatively Furthering Fair Housing:** The proposal is consistent with the 2018 Analysis of Impediments to Fair Housing Choice prepared by the Los Angeles County Development Authority for the Urban County.
- **Access to Information:** In accordance with Federal and County policies, the County will ensure that the public has equal access to information about the proposed activities, including persons with disabilities and limited English proficiency. The County will ensure that program information is available in the appropriate languages for the unincorporated areas of Los Angeles County, and in accessible formats for persons with disabilities.
- **Physical Accessibility:** All meetings for the proposal will be held in facilities that are physically accessible to persons with disabilities, and all notices of and communications during all public meetings will be provided in a manner that ensures effective communication for persons with hearing, visual, and other communication or speech-related disabilities.
- **Environmental Review:** On October 24, 2023, the County Board of Supervisors found that the application, grant award acceptance, and administration are related to “information and financial services,” and “administrative and management activities,” and that the proposed actions are exempt from NEPA in accordance with 24 C.F.R. §§ 58.34 (a)(2) – (3). Appropriate NEPA environmental documents will be prepared for the individual activities as needed.
- **Federal Assistance Assurances:** The County’s registration has been updated to include information on the Federal Assistance Representations and Certifications section on the Sam.gov registration.

EXHIBIT C Need

County of Los Angeles

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i. Describe your efforts so far to identify, address, mitigate, or remove barriers to affordable housing production and preservation. (12 points)

The County of Los Angeles (County) has worked diligently for nearly a decade to address the continued and seemingly intractable issue of affordability and housing supply for its 1.1 million residents in unincorporated Los Angeles County. Beginning in 2015, the County Board of Supervisors (Board) established a multi-year plan to provide new funding for the creation and preservation of new affordable housing. Through the formation of an affordable housing budget unit within the office of the Chief Executive Officer, and through subsequent direction to various departments, including the Department of Regional Planning, the Board has established their vision and expectations for the prioritization of affordable housing solutions.

Between 2015 and 2016, the Board directed staff to consider and prepare various ordinances including a Density Bonus Ordinance and an Inclusionary Housing Ordinance. They adopted strategies to increase affordable/homeless housing, including 1) promotion of zoning reform and compliance for by right homeless shelters; 2) accessory dwelling unit pilot program; 3) incentive zoning/value capture strategies; and 4) the use of public lands for homeless and affordable housing developments.

These actions culminated in the 2017 approval of a countywide ballot measure, where County voters approved a sales-tax measure (Measure H) to generate approximately \$355 million annually for services to combat homelessness. Since the Measure H ballot went into effect in July 2017 (through December 2022):

- 34,881 people have been permanently housed.
- 65,328 people sheltered in facilities funded through Measure H.
- 7,460 people prevented from becoming homeless.

In January 2018, the Department of Regional Planning released the Los Angeles County Affordable Housing Action Plan (not to be confused with the required annual Action Plan for the use of CDBG funds) for unincorporated Los Angeles County. The Affordable Housing Action Plan provided a road map for implementation of recommendations that would: 1) Produce more affordable housing units in the short-term, particularly for vulnerable communities in priority locations; 2) Generate funding for affordable housing; 3) Reduce barriers to streamline the process for housing development; and 4) Draw from other successful programs and initiatives to avoid reinventing the wheel.

The summary of these collective planning and policy efforts to date are:

- Density Bonus Ordinance – adopted August 2006, amended October 2019
- Reasonable Accommodations Ordinance --- adopted November 2011, update pending adoption in 2024
- Inclusionary Housing Ordinance – adopted November 2020, update pending adoption in early 2024
- Compact Lot Subdivision Ordinance – adopted June 2020

- Accessory Dwelling Unit Ordinance – adopted April 2019, amended October 2020, update pending adoption in 2024
- By Right Housing Ordinance – adopted March 2021, update pending adoption in 2024
- Interim and Supportive Housing Ordinance – adopted April 2021, update pending adoption in 2024
- Affordable Housing Preservation Ordinance – adopted April 2021, update pending adoption in 2024
- Housing Element of the General Plan – adopted December 2022 and certified by the State of California April 2023
- Residential design standards for multi-family development – pending adoption by December 2023
- Metro Area Plan (rezoning program) – pending adoption in early 2024
- Adaptive Reuse Ordinance—pending adoption in 2025

Measurable impacts of these policy initiatives include:

- Since 2019, the County has averaged approximately 1,005 ADUs annually resulting from regulatory changes and permit streamlining efforts. Prior to the ordinance, approximately 150 ADUs were entitled annually.
- In CY 2022, 28% of eligible Density Bonus projects received a greater local density bonus under the County’s ordinance than would have been allowed under State provisions.
- In CY 2022, 38 projects, or 83% of eligible affordable housing projects, were approved ministerially, compared to 8 projects, or 17%, which required discretionary approvals.

The result of these efforts is admirable, but barriers to affordable and homeless housing solutions remain and much work still needs to occur.

ii. Do you have acute demand for affordable housing? What are your remaining affordable housing needs and how do you know? (13 points)

The County of Los Angeles serves a priority geography according to HUD’s own methodology and therefore has a demonstrated acute demand for affordable housing for households below 100 percent of the Area Median Income (AMI).

In cooperation with the California Housing Partnership, the County produces an annual Housing Outcomes Report. As documented in the 2022 Los Angeles County Annual Affordable Housing Outcomes Report, 87% of deeply low-income (DLI) households, 72% of extremely low-income (ELI) households, and 40% of very low-income (VLI) households were severely cost-burdened in 2019. People of color are more likely to experience housing cost burdens than their White counterparts, with Black renter households experiencing the highest cost burden rate at 62%. Los Angeles County faced a shortfall of 499,430 (countywide) affordable homes to meet demand among renter households at or below 50% AMI. Also, the 2020 Point-In-Time (PIT) count revealed approximately 66,436 individuals experiencing homelessness. In addition, the report notes that rising rents and expiring restrictions have put the County at risk of losing nearly 8,000 existing affordable homes unless the County and other stakeholders take action to preserve them.

California State Housing laws require regional planning agencies to determine the housing needs for individual jurisdictions. Specific to Los Angeles County as a whole, the Regional Housing Need for 2021-2029 was approximately 812,000 housing units. The County of Los Angeles, as the second largest jurisdiction behind the City of Los Angeles, is required to plan for 90,052 housing units during this time frame. The RHNA is further broken out into eligible income categories as follows:

RHNA 2021-2029	Extremely Low/Very Low (<50% AMI)	Lower (50-80% AMI)	Moderate (80-120% AMI)	Above Moderate (>120% AMI)	Total
	25,648	13,691	14,180	36,533	90,052

Local demographics, as captured in the County’s adopted Housing Element include the following key demographics:

- As of 2020, the population for the County of Los Angeles was 1,034,689, spread over nearly 2,400 square miles within 125+ communities. This accounts for 11percent of the total population of Los Angeles County as a whole. Approximately 50 percent of the households identify as Hispanic; approximately 23.7 percent identify as White (non-Hispanic); 11.2 percent identify as Black (non-Hispanic); and 15.1 percent identify as Asian or another ethnicity (non-Hispanic).
- According to the 2014-2018 ACS, seniors account for 13 percent of the population, yet approximately 24 percent of households are headed by seniors. Of the senior-headed households, approximately 78 percent are homeowners and 22 percent are renters.
- Nearly 20 percent of the total population experience a disability. According to the 2014-2018 ACS, 32 percent of persons with a disability are employed compared to 71 percent of persons with no disability.
- In 2020, there were an estimated 6,088 people experiencing homelessness in unincorporated Los Angeles County. This number has increased, as the countywide statistic jumped 12 percent from 66,436 in 2020 to 75,518 in 2023.
- A majority of the housing stock comprise single-family homes. Multifamily housing accounts for approximately 21 percent of housing units. The largest share of housing units were built between 1950 and 1959. Nearly 90 percent of the housing stock was built before 1990, making the units over 30 years of age.
- Approximately 20 percent of households have five or more people as of 2018.
- “Overcrowded” is defined as 1 to 1.5 persons occupying a room, excluding bathrooms, kitchens, hallways, and porches. Overcrowding is more common among renter-occupied units, at 19.3 percent with over 1 person per room, as compared with owner-occupied units, at 6.8 percent with over 1 person per room.

iii. What key barriers still exist and need to be addressed to produce and preserve more affordable housing? (10 points)

The County's planning area—the unincorporated areas of Los Angeles County—is astonishingly diverse in its population, geography and patchwork of contiguous and non-contiguous communities. Encompassing nearly 2,400 square miles and serving 1.1 million people in 125+ separate communities, the County of Los Angeles serves as the municipal provider for these communities. The County's diversity of communities range from the rural mountain hamlet of Lake Hughes with 649 residents to the dense urban area of East Los Angeles, with nearly 126,496 residents. More than 140 cultures and as many as 224 languages are spoken in these communities, and housing options range from sprawling modern single-family homes in high desert communities to overcrowded apartment buildings in desperate need of rehabilitation.

Because of the County's geographic diversity and the diversity of housing types, a single solution for the increased production of affordable housing is not feasible. The unique characteristics of individual communities, whether it is based on housing type, race, immigration status, income, digital proficiency, or definition of household requires a highly engaged, and often repetitive and lengthy community engagement strategy delivered in multiple languages.

In recent years, the County has made significant progress in improving its development review process and procedures, including modifying development standards to facilitate by-right residential development. While the land use controls are not unreasonable or cause substantial constraints on development, there remain additional opportunities to remove barriers from the Zoning Code to accommodate the changing housing needs for unincorporated Los Angeles County. For example, the entitlement process in and of itself is difficult to navigate, particularly for less sophisticated applicants. The County has attempted to streamline the process through ordinance amendments, organizational change, technology, and increased efficiencies in case processing. However, the use of plain language throughout the process, availability of applications in multiple languages, and access to direct assistance to navigate technology are all needed. The cost of entitlements is also a significant barrier, and the County must better balance the entitlement cost with the budgetary need for full cost recovery. For example, the use of standardized plans for ADUs would directly benefit homeowners by reducing costs for architectural drawings and would also simplify the review process, which could then lead to lower entitlement costs for the homeowner.

Other barriers that prohibit equitable housing production remain in the Zoning Code. While the implementation of the larger rezoning program via area plans is expected to reduce barriers that constrain the availability of sites for housing production, the Zoning Code still contains racist definitions and terminology and restrictions that constrain housing production. The Zoning Code still allows nuisance uses to be sited next to residential neighborhoods and, based on legacy zoning patterns that date back to redlining, these nuisance uses are more often than not allowed in neighborhoods where Black, Indigenous, People of Color (BIPOC) reside or in neighborhoods already experiencing high poverty rates. As such, the County needs to make proactive changes that promote more inclusive communities, remove barriers to affirmatively furthering fair housing, and prevent incompatible land uses from affecting BIPOC communities.

In addition, adequate infrastructure and public services are necessary to accommodate future housing development. Existing and projected deficiencies in infrastructure and public services in unincorporated Los Angeles County are primarily a result of growth and development pressures, although increased consumption by existing customers is also a factor. For example, to ensure that the demands from new development will be met, the County requires developers to install new sewer infrastructure to serve the development and connect to the County's system. Sewer systems in certain parts of unincorporated Los Angeles County are aging and require upgrades. Historically, the County does not plan for sewer infrastructure needs through long-range capital improvement planning, and instead addresses sewer infrastructure incrementally. New development can overburden aging infrastructure that is not meant to handle the additional demands that higher density developments can generate. In these cases, the cost for upgrading the sewer infrastructure becomes the burden of the higher density developer, causing a significant disincentive to the realization of that project. In rural communities, developers may need to build entirely new sewer, stormwater, and street infrastructure. In this example, anticipated residential traffic generated from the project may trigger additional offsite traffic engineering improvements to mitigate project impacts to an acceptable level. In cases where housing developments may generate 50 or more peak hour trips, the developer is required to establish a Congestion Management Program and offer financial incentives or other traffic reduction solutions. These requirements add to the cost of housing production.

EXHIBIT D Soundness of Approach

County of Los Angeles

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b. SOUNDNESS OF APPROACH (Maximum 35 points)

i. What is your vision? (15 points)

The vision for the County's proposal is to enable increased production and preservation of affordable housing across a broad geographic area over a sustained timeframe through activities related to **Infrastructure Planning, Transit Oriented Districts, and Equity/Fair Housing**. The proposed activities are identified in the County's General Plan, which is a comprehensive plan adopted by the County Board of Supervisors in October 2015 for land use and growth for the unincorporated Los Angeles County; and the Housing Element of the General Plan, which was adopted by the County Board of Supervisors in May 2022 and certified by the State of California Department of Housing and Community Development on May 27, 2022. These activities were identified through a lengthy public process for both the General Plan and the Housing Element, which includes hundreds of meetings and community engagement activities with a diversity of stakeholders.

The benefits from the County's proposal will be realized long-term--likely over the next decade. All projects will work in conjunction with other existing County policies related to rent stabilization; tenant protections; density bonuses for affordable housing; and affordable housing preservation, which requires the replacement of affordable housing and right of first refusal for displaced residents. In addition, the County has an existing inclusionary housing policy that requires a maximum 20% set aside for lower income (up to 80% AMI) households for rental housing. In addition, State law requires that all new by-right housing developments on parcels rezoned to implement a Housing Element be required to set aside 20% of all units for lower income (up to 80% AMI) households. An amendment to the County's set-aside policy, which is scheduled for public hearing on December 13, 2023, proposes to update the set-aside requirements to align with the State's requirements, and to apply to more communities. Through the local and state requirements for inclusionary zoning, the County expects to increase production of more units affordable to a variety of income levels. These efforts to increase the supply of affordable units must occur in concert with offsite infrastructure planning, site availability and increased ease of permitting in high resource areas like Transit Oriented Districts and must address the legacy of redlining and other government restrictions to produce more equitable housing solutions.

Infrastructure Planning

The County is undergoing an ambitious rezoning program to accommodate over 56,000 by-right units, approximately half of which is affordable to LMI households, by the end of 2024. This rezoning strategy is supported by the development of multiple area plans, which are comprehensive land use plans for clusters of unincorporated communities within Los Angeles County. An opportunity exists to prepare capital improvement plans (CIPs) that prioritize new infrastructure and improvements to existing infrastructure that support affordable housing production that is incentivized through these area plans. It is not current practice for the County to develop CIPs for planning areas or to proactively coordinate infrastructure planning with land use planning. The proposed infrastructure planning activities will not only incentivize affordable

housing production but will also streamline the development process and lead to greater investment in key areas identified within the area plans. The CIPs will, at a minimum, focus on sewer and transportation infrastructure given the direct impacts to housing costs; but can include water, stormwater, dry utilities, recreational and open space, and other infrastructure, based on the needs and unique characteristics of each planning area.

These activities address the national objective for *planning and policy activities supporting affordable housing*, specifically national objective S, by connecting infrastructure with area plans. The result would strategically connect housing, transportation, and economic growth at a regional scale. The activities also address the national objectives for *infrastructure activities*, specifically A, B, and E, by developing plans to identify new and upgraded infrastructure needs that expand the capacity for affordable housing. The infrastructure improvements would also enhance quality of life and emphasize public safety, such as bicycles lanes, controlled intersections, crosswalk improvements, planting of shade trees and other improvements that can benefit LMI communities. The proposed activities also constitute eligible activities in that they benefit LMI households and prevent or eliminate slums or blight through the increased production of affordable housing and improve quality of life through the provision of infrastructure.

East San Gabriel Valley Planning Area CIP: The proposed activity develops a CIP for the East San Gabriel Valley Planning Area, located in the eastern portion of Los Angeles County. In August 2023 the County's Regional Planning Commission approved the East San Gabriel Valley Area Plan (ESGVAP) a comprehensive land use plan for 24 unincorporated communities that share a common geography. The ESGVAP will be considered by the County Board of Supervisors in early 2024. The ESGVAP implements the County's Housing Element rezoning program to identify sites for at least 2,978 units affordable to very low income (up to 50% AMI) households, and 308 units affordable to lower income (up to 80% AMI) households, as well as 4,152 market rate units. It also rezones an additional 1,498 parcels to increase residential densities on previously low-density single family zoned parcels, and 16,918 additional parcels will be rezoned from legacy agriculture zones to residential zones. The CIP will use the ESGVAP as the basis for analysis for increased infrastructure capacity. It may also inform additional amendments to this plan in the future, as we consider a missing middle income residential zoning program that could benefit from improved infrastructure capacity.

Gateway Area Plan and Gateway Planning Area CIP: The proposed activity develops an area plan and CIP for the Gateway Planning Area, located in the southeastern portion of Los Angeles County. In May 2023 the County Board of Supervisors indicated its intent to approve the Gateway Rezoning Program, which redesignates and/or rezones 1,315 parcels in the unincorporated communities of South Whittier-Sunshine Acres and West Whittier-Los Nietos. The Gateway Rezoning Program is anticipated to be in place by November 2023. It will implement the County's Housing Element rezoning program by creating sites for at least 651 units affordable to very low income (up to 50% AMI) households and 4,152 market rate units. The Gateway Area Plan, which include South Whittier-Sunshine Acres, West Whittier-Los Nietos, and Rancho Dominguez, will provide more context to the recently completed rezoning and will better coordinate housing,

transportation, and economic growth with the infrastructure planning in the CIP. The CIP will use the Gateway Area Plan as the baseline for analysis of increased infrastructure capacity.

Please note that the County has a pending proposal for \$1.5 million for the State of California's Regional Early Action Planning Grant (REAP 2.0), administered locally by the South California Association of Governments, for the development of a regional sewer area model for communities in the Gateway Planning Area (as well as Metro Planning Area). Because it is pending, it is not listed in Exhibit F Leverage; however, as the grant is non-competitive, it has been accounted for in the budget estimates for the County's PRO Housing proposal to avoid funding and scope overlap. The findings from this regional sewer area analysis will inform the larger CIP.

Metro Planning Area CIP: The proposed activity develops a CIP for the Metro Planning Area. In September 2023 the County's Regional Planning Commission approved the Metro Area Plan (MAP). The MAP is a long-range planning document that provides a policy framework for how and where seven unincorporated communities will grow over the next 15 years, while celebrating the culture and history of these communities. The seven contiguous urban communities include East Los Angeles, East Rancho Dominguez, Florence-Firestone, Walnut Park, West Athens-Westmont, West Rancho Dominguez-Victoria, and Willowbrook and represent a population of nearly 310,000 residents. The MAP aims to streamline and update existing County regulations in these communities to encourage more housing development, and multi-modal transportation, while focusing on environmental justice issues. The MAP will consider the guiding principles of the General Plan including Smart Growth, Community Services & Infrastructure, Economic Strength & Diversity, Environmental Resource Management, Healthy, Livable & Equitable Communities, and Community Voices, Strengths & Equity Outcomes. It is scheduled for consideration by the Board of Supervisors on December 12, 2023 and will be adopted in early 2024. It implements the County's Housing Element rezoning program to create sites for at least 7,194 units affordable to very low income (up to 50% AMI) households, 3,253 units affordable to lower income (up to 80% AMI) households, and 9,250 units affordable to moderate income (up to 120% AMI) households, as well as 6,230 market rate units. The CIP will use the MAP as the basis for analysis for increased infrastructure capacity.

Please note that the County has a pending proposal for \$1.5 million for the State of California Regional Early Action Planning Grant (REAP 2.0), administered locally by the South California Association of Governments, for the development of a regional sewer area model for communities in the Metro Planning Area (as well as Gateway Planning Area). Because it is pending, it is not listed in Exhibit F Leverage; however, as the grant is non-competitive, it has been accounted for in the budget estimates for the County's PRO Housing proposal to avoid funding and scope overlap. The findings from this project will inform the CIP. It may also inform additional amendments that could be made to the area plan to support missing middle income housing solutions.

South Bay Planning Area CIP: The proposed activity develops a CIP for the South Bay Planning Area, located in the southwestern portion of Los Angeles County. The South Bay Area Plan (SBAP) is proposed as a community-based plan that responds to the unique and diverse character of the seven non-contiguous unincorporated communities of Alondra Park/El Camino Village, Del

Aire/Wiseburn, Hawthorne Island, La Rambla, Lennox, West Carson, and Westfield/Academy Hills. The area plan will develop policies for future community growth and development and will attempt to address issues such as traffic congestion, air quality concerns, lack of developable land, goods movement, climate change, environmental justice, and noise impacts. The SBAP is scheduled for completion in late 2024. Like the other area plans, it implements the County's Housing Element rezoning program to create sites for at least 2,197 units affordable to very low income (up to 50% AMI) households and 3,801 market rate units. The CIP will use the SBAP as the basis for analysis for increased infrastructure capacity. It may also inform additional amendments that could be made to the area plan to support missing middle income housing solutions.

West San Gabriel Valley Planning Area CIP: The proposed activity develops a CIP for the West San Gabriel Valley Planning Area (WSGVAP), which encompasses eight non-contiguous suburban communities of Altadena, East Pasadena-East San Gabriel, Kinneloa Mesa, La Crescenta-Montrose, San Pasqual, South Monrovia, South San Gabriel, and Whittier Narrows, and is scheduled for completion by late 2024. It implements the County's Housing Element rezoning program to create sites for at least 1,860 units affordable to very low income (up to 50% AMI) households, and 184 units affordable to lower income (up to 80% AMI) households and 6,168 market rate units. The CIP will use the WSGVAP as the basis for analysis for increased infrastructure capacity, and will support the principles of walkability, pedestrian safety, connectivity, and community vibrancy.

Westside Planning Area CIP: The proposed activity develops a CIP for the Westside Planning Area, which is located north of the South Bay Planning Area in Los Angeles County. The Westside Area Plan, scheduled for completion in late 2024, covers the non-contiguous and disparate communities of Ladera Heights, View Park – Windsor Hills, Franklin Canyon, West Los Angeles Sawtelle VA, West Fox Hills, and Marina del Rey, as well as two unincorporated communities referred to as Gilmore Island and Beverly Hills Island. It aims to streamline and update existing County regulations to encourage more housing development, historic preservation, and multi-modal transportation, while focusing on environmental justice issues around oil wells and future development. The Westside Area Plan will consider the guiding principles of the General Plan including Smart Growth, Community Services & Infrastructure, Economic Strength & Diversity, Environmental Resource Management, Healthy, Livable & Equitable Communities, and Community Voices, Strengths & Outcomes. It implements the County's Housing Element rezoning program to create sites for at least 1,646 units affordable to very low income (up to 50% AMI) households, and 735 units affordable to lower income (up to 80% AMI) households and 2,534 market rate units. The CIP will use the Westside Area Plan as the basis for analysis for increased infrastructure capacity. It may also inform additional amendments that could be made to the area plan.

Transit Oriented Districts

Transit Oriented Districts are areas that are supported by major public transit infrastructure and provide opportunities for a mix of higher intensity development, including multifamily housing, employment and commercial uses. TODs typically offer opportunities for integrated design

solutions, allow compact development and support improvements that promote Complete Streets and active transportation, such as trees, lighting, pedestrian crosswalk enhancements and bicycle lanes. Based on its scale, TODs also provide opportunities to implement focused affordable housing policy tools, such as value capture, to increase residential densities, strengthen displacement policies, and garner community benefits. By coordinating higher residential densities with transportation, parking, community-serving uses and amenities that support pedestrian and bicycle safety, TODs can also create a welcoming, safe environment and contribute to mobility goals.

The proposed activities address the national objective for *planning and policy activities supporting affordable housing*, specifically B, by developing TOD specific plans to encourage housing development or preservation of existing higher density projects. The proposed activities also constitute eligible activities in that they benefit LMI households, and by encouraging equitable redevelopment, they also prevent or eliminate slums or blight.

East Los Angeles TOD Specific Plan Update: The proposed activity updates the existing East Los Angeles TOD Specific Plan (TOD Specific Plan), which was adopted by the Count Board of Supervisors in November 2014. The TOD Specific Plan established a new form-based code, with standards and strategies to encourage and support sustainable, transit-supportive, pedestrian-friendly, and economically vibrant areas surrounding four Metro E Line stations in unincorporated East Los Angeles. Highly innovative at the time of its adoption, the TOD Specific Plan needs to be updated to remove barriers to new higher density housing and further encourage Complete Street improvements and mixed-use development that incorporate local commercial serving uses and multifamily housing.

LA Metro is currently planning an expansion of the E Line, which currently ends at the Atlantic Station in the TOD Specific Plan. The pending rail project will extend the E Line south toward the City of Whittier. As the extension may run along Atlantic Boulevard and result in an addition Metro E Line Station within unincorporated East Los Angeles, the update to the TOD Specific Plan is timely and will require a focus on anti-displacement and anti-gentrification efforts for both commercial and residential uses.

East Pasadena-East San Gabriel TOD Specific Plan: The proposed activity develops the East Pasadena-East San Gabriel TOD Specific Plan, which will focus on the unincorporated areas surrounding the Metro A Line Sierra Madre Villa Station. Located south of the City of Pasadena, the unincorporated East Pasadena-East San Gabriel is within the West San Gabriel Valley Planning Area mentioned previously. The TOD Specific Plan will be identified as an implementation program in the West San Gabriel Valley Area Plan.

The intersection of Colorado Boulevard and Rosemead Boulevard near the existing Metro A Line Sierra Madre Villa Station is an active local commercial center. This area provides the opportunity for increased pedestrian and bicyclist improvements and more transit-oriented developments. In addition, along Rosemead Boulevard, there is a variety of retail and commercial uses, such as restaurants and services as well as apartment complexes.

Equity/Fair Housing

In July 2020, the County Board of Supervisors adopted the Anti-Racist, Diversity, and Inclusion (ARDI) Initiative. This broad-based initiative governs the County's commitment to fighting systemic and systematic racism in all forms affecting Black, Indigenous and People of Color (BIPOC) communities. Past systemic racism and discriminatory housing practices by government agencies such as the use redlining maps and restrictive housing covenants have not only resulted in long-term inequality but have shaped the physical environment and significantly influenced the residential land use patterns that we know today. For example, over 70% of residential land in unincorporated Los Angeles County are zoned for single-family residences. While many past practices of systemic racism have been eliminated, they may still manifest in less overt ways, such as racist definitions and exclusionary policies in zoning codes. Removing barriers and affirmatively furthering fair housing are important strategies to reversing land use patterns and unraveling the legacy of past systemic racism and combatting the systemic racist policies that persist today.

These activities address the national objective for *planning and policy activities supporting affordable housing*, specifically, B, E, and L by removing barriers to affordable housing development and preservation in plans and in the zoning code, by expanding affordable housing programs to low density and high-opportunity neighborhoods, and affirmatively furthering fair housing by encouraging missing middle housing types in single family zoned areas. The proposed activities also constitute eligible activities in that they benefit LMI households through the creation of affordable housing opportunities in high resource areas and remove discriminatory policies.

Missing Middle and Gentle Density Housing Program: The proposed activity implements the Missing Middle and Gentle Density Housing Program, which is a countywide strategy. Understanding that high density residential development may not be financially feasible in all areas of unincorporated Los Angeles County due to high land costs or required infrastructure investment, this program will assess land use tools that encourage the development of low to mid-density housing types, such as bungalow and cottage courts, duplexes, triplexes and fourplexes that are context-sensitive in existing residential neighborhoods. The assessment will study the feasibility of these 'gentle density' building typologies in unincorporated Los Angeles County and will enact by-right implementation mechanisms. The resulting program will include anti-displacement strategies to increase housing opportunities in traditionally low-density residential zones, particularly in High or Highest Resource areas as determined by the California Tax Credit Allocation Committee. This program will also build on the existing Compact Lot Subdivision Ordinance that allows for single family development on smaller parcel sizes in certain residential zones.

Equity Audit: The proposed activity is a comprehensive review of the General Plan, all community-based plans and specific plans, and the Zoning Code from an anti-racist and equity lens. It will identify and remove barriers to equitable housing production, remove racist definitions and terminology, remove exclusionary policies, prevent incompatible land uses from affecting BIPOC communities, address the unique housing needs of members of protected class groups, and

make proactive changes to promote more inclusive communities. This will be implemented through various zoning code and plan amendments.

Proposal	National Objective	Eligible Activities
<p>Infrastructure Planning -East San Gabriel Valley Planning Area CIP -Gateway Area Plan and Gateway Planning Area CIP -Metro Planning Area CIP -South Bay Planning Area CIP -West San Gabriel Valley Planning Area CIP -Westside Planning Area CIP</p>	<p>Planning and policy activities supporting affordable housing S. Developing regional planning models that enhance location efficiency by focusing on connecting housing, transportation, and economic growth. Infrastructure activities A. Installing new utilities and/or infrastructure improvements necessary for the development or preservation of affordable housing. B. Upgrading existing utilities or improvements to increase an area’s overall capacity for new housing. E. Investing in neighborhood amenities that benefit low-and-moderate income residents such as parks, community centers, bike lanes and improvements to the physical environment that increase public safety such as streetlights or sidewalks.</p>	<p>a. Benefiting low- and moderate-income persons. b. Preventing or eliminating slums or blight.</p>
<p>Transit Oriented Districts -East Los Angeles TOD Specific Plan Update -East Pasadena-East San Gabriel TOD Specific Plan</p>	<p>Planning and policy activities supporting affordable housing B. Developing or updating housing plans, community development strategies, and zoning and land use policies such as overlays to encourage multifamily and mixed-use development or access to affordable housing, floating zones (such as redevelopment, workforce housing, or live/work zones in high opportunity areas), incentive zoning, transit-oriented development zones, or ordinances to encourage housing development or preservation.</p>	<p>a. Benefiting low- and moderate-income persons. b. Preventing or eliminating slums or blight.</p>
<p>Equity/Fair Housing -Missing Middle and Gentle Density Housing Program -Equity Audit</p>	<p>Planning and policy activities supporting affordable housing B. Developing or updating housing plans, community development strategies, and</p>	<p>a. Benefiting low- and moderate-income persons.</p>

	<p>zoning and land use policies to simplify, streamline, or change overlays that create a barrier to affordable housing development or preservation, such as architectural review or historic preservation overlays.</p> <p>E. Expanding existing affordable housing incentive programs to wider geographies, including high-opportunity neighborhoods</p> <p>L. Developing proposals for higher-density zoning for current single-family and multi-family zones, including rezones to allow duplexes, triplexes, or fourplexes by-right in all areas zoned primarily for single-family homes and encourage property owners to ensure that any infill development improves or maintains walkability.</p>	
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The proposed activities for **Infrastructure Planning** and **Transit Oriented Districts** address the Needs identified in this proposal in a number of ways. Because of the County’s geographic diversity and the diversity of housing types, preparing plans by Planning Area and District help to align policies to increase affordable housing opportunities with the unique characteristics and needs of each area. The proposed activities for the **Transit Oriented Districts** and **Equity/Fair Housing** remove barriers to the Zoning Code. All of the proposed activities work in conjunction with existing anti-displacement policies, and the **Transit Oriented Districts** will explore opportunities to build on and strengthen those protections. The proposed activities for **Equity/Fair Housing** address the Needs identified in this proposal by removing exclusionary policies and creating housing opportunities in higher resource areas. We have seen that there is great demand for missing middle housing types. For example, when State laws allowing accessory dwelling units (ADUs) by right became effective in 2017, several jurisdictions, including the County, saw a significant increase in applications and construction activity for ADUs. In 2022, the County approved 20 times more ADUs than in 2016. By removing barriers, the proposed activities will also increase housing production and preservation in a way that is equitable, does not lead to displacement, and affirmatively furthers fair housing. Furthermore, all proposed activities will help streamline the entitlement process and reduce costs by removing barriers and adding certainty to the review of projects. In particular, infrastructure issues, such as a required sewer study, can be an unexpected requirement for projects, as they are requested on a case by case basis. While the improvements to infrastructure will in the long run reduce housing costs, in the short term, having the CIPs in place will help streamline the entitlement process by providing certainty to housing developers.

Infrastructure Planning

Although CIPs are commonly used by local jurisdictions to plan for new and to upgrade existing infrastructure, it is not a current practice for the County. In addition, the County has not proactively

coordinated infrastructure planning with land use planning at a planning area level. This could be due, in part, to the County's fragmented planning areas in between 88 cities, as well as the organizational structure of the County. The Department of Regional Planning focuses on land use planning, while Public Works focuses on infrastructure. The County can learn from the City of Austin's collective Capital Improvement Program and their experience that led to the establishment of the Capital Planning Office in 2010. The impetus for that effort came from recognizing the need to align their comprehensive long-range plan with capital projects. The County can emulate the City of Austin's efforts to use CIPs to overcome organizational challenges, which can help facilitate coordination between departments, streamline and add certainty to the development process, and increase the production of housing. The City also offers models for developing CIPs for plans at varying scales, including area plans.

While preparing CIPs for area plans is not a current practice for the County, the proposed activities are appropriate and timely, given the near completion of the area plans and rezoning effort, and the opportunity to ensure the success of the housing policies in the area plans through the provision of infrastructure. The County can overcome the geographic challenges by proactively coordinating with adjacent cities and tapping into existing networks.

Transit Oriented Districts

The County has prepared multiple TOD specific plans: Florence-Firestone TOD Specific Plan, 2023; West Athens-Westmont TOD Specific Plan (Connect Southwest LA Specific Plan), 2019; West Carson TOD Specific Plan, 2019; Willowbrook TOD Specific Plan, 2018; and East Los Angeles TOD Specific Plan (East Los Angeles Third Street Specific Plan), 2014. One lesson-learned from the experience of preparing TOD specific plans is to better coordinate the interplay between the TOD specific plan and the General Plan so that they are not perceived to be stand-alone documents. Another lesson-learned is to use the opportunity, in preparing or updating a TOD, to incorporate bold, innovative housing policies, such as value capture, which may be too complex to implement at a larger scale. To ensure success with the proposed activities, the County will clearly reflect the linkages to the General Plan in the TOD specific plans, and commit early on to identifying affordable housing tools that can be incorporated.

Equity/Fair Housing

The County can learn from the equity efforts of King County, WA, which stemmed from a desire to incorporate equity into their long-range plans and municipal functions. In 2015, King County developed the Equity Impact Review tool to assess, identify gaps, and communicate the impact of county policies and program on equity. While the County's proposed activities are focused on removing barriers in plans and the Zoning Code, the County can emulate King County's tools and approaches to correct and reverse systematic racism within their programs and policies in a meaningful and significant way.

The County is also learning from the experience of the City of Seattle and the City of Minneapolis to allow missing middle housing types, such as duplexes, triplexes, and fourplexes in traditionally single-family neighborhoods. Both efforts entailed a significant outreach component but took different approaches to zoning. City of Seattle upzoned their single-family areas, while City of

Minneapolis modified the single-family zone. Furthermore, in recent years, the State of California has enacted several laws to allow accessory dwelling units (ADUs), lot splits, and other forms of “gentle density” to increase housing opportunities.

Recently, the Minneapolis 2040 Plan, which incorporates the missing middle strategy, encountered legal roadblocks related to its environmental analysis. From the County’s own experience with implementing recent state laws, missing middle housing in single family neighborhoods is a controversial and divisive issue, but an important policy that can help to address the housing crisis and affirmatively further fair housing. Based on lessons-learned, the County will ensure that the proposed activities include a comprehensive environmental analysis, robust community engagement program, and strong emphasis on design.

The proposed activities for **Infrastructure Planning**, **Transit Oriented Districts**, and **Equity/Fair Housing** align with several existing County and regional initiatives, policies, and programs, including but not limited to:

- Anti-Displacement and Affordable Housing: Housing Element (General Plan), Homeless Initiative, Inclusionary Housing Ordinance, Density Bonus Ordinance, Affordable Housing Preservation Ordinance, Rent Stabilization Ordinance, County tenant protections.
- General Plan: Area plans, Transit Oriented Districts, SCAG SoCal Connect 2020.
- Sustainability: Climate Action Plan (General Plan), OurCounty Sustainability Plan, Climate Vulnerability Assessment.
- Equity: Anti-Racism, Diversity, and Inclusion Initiative; LA County Planning Strategic Plan; Equity Indicators Tool; Green Zones Program; Environmental Justice Screening Method Tool; Equity Explorer Tool.
- Infrastructure: Delete the Digital Divide; Equity in Infrastructure Initiative; Vision Zero Plan; Pedestrian Plans (General Plan); Bicycle Master Plan (General Plan).

As the proposal is from the General Plan, it is also in alignment with SoCal Connect 2020, which the regional transportation plan for the Southern California Association of Governments region. Alignment with these initiatives, policies, and programs ensure that the proposed activities will increase and preserve affordable housing, and directly benefit LMI households in an equitable, holistic, and meaningful way. The proposed activities will work in conjunction with these initiatives to ensure that existing residents and LMI households have equal access to the safe and welcoming environments, and access to public transit, jobs, public services, and amenities created by the proposed activities. By increasing housing production and aligning with land use and economic development strategies in the General Plan, the proposed activities also support job creation and retention efforts.

ii. What is your geographic scope? (5 points)

The County of Los Angeles is responsible for land use and infrastructure for the unincorporated Los Angeles County, which represent approximately 2,600 square miles, or 65% of the land area. As shown in yellow on the map, the unincorporated areas are in and around 88 incorporated cities in Los Angeles County and serve over 1.1 million people across 125 distinct communities. The proposal includes activities that apply to unincorporated areas countywide and those that focus on

the following six planning areas, which comprise unincorporated areas located outside of environmentally sensitive, agricultural, rural, and hazardous (wildfire, seismic, flood) areas: East San Gabriel Valley, Gateway, Metro, South Bay, West San Gabriel Valley, and Westside. The proposed TOD specific plans are focused on areas near Metro transit stations in unincorporated East Los Angeles (Metro Planning Area) and East Pasadena-East San Gabriel (West San Gabriel Valley). These six planning areas represent 848,542 people, 129 square miles, and 55 communities.

The proposal encompasses census tracts that are HUD Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). They are in the Metro Planning Area (3 census tracts); South Bay Planning Area (1 census tract); and Westside Planning Area (1 census tract). The proposal also comprise all opportunity areas defined by the State of California Tax Credit Allocation Committee: Highest Resource, High Resource, Moderate Resource (Rapidly Changing), Moderate Resource, Low Resource, or areas of High Segregation and Poverty. This is summarized below:

- 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
- 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

It should be noted that Metro Planning Area does not include High or Highest Resource tracts and West San Gabriel Valley Planning Area does not include Low Resources tracts. Given the geographic scope and scale of the proposal, there are opportunities to both preserve and create housing units in high opportunity areas and expand opportunity in underserved communities. This can be achieved by planning area and/or well as between planning areas.

Planning Areas Framework

Figure 5.1

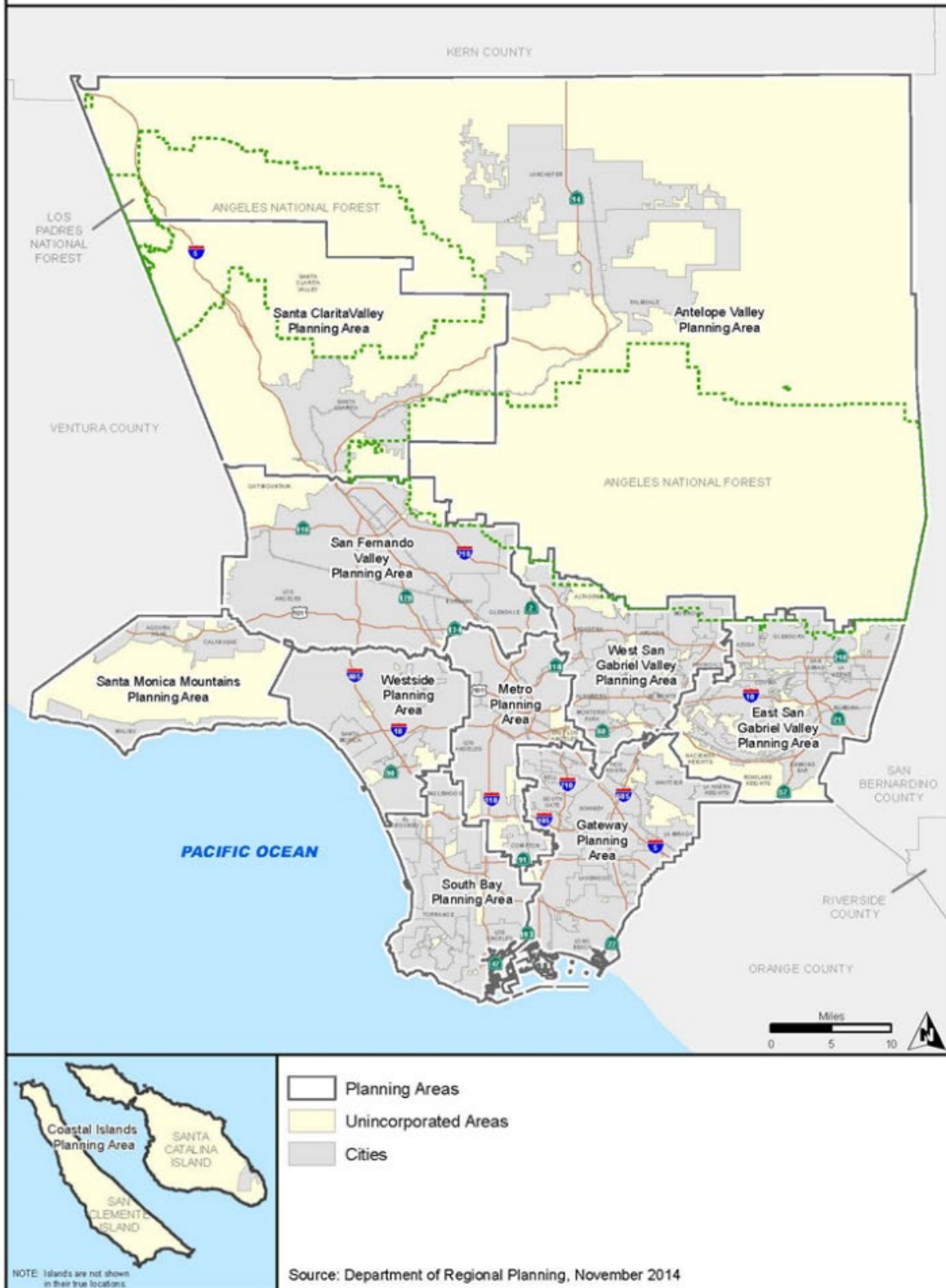
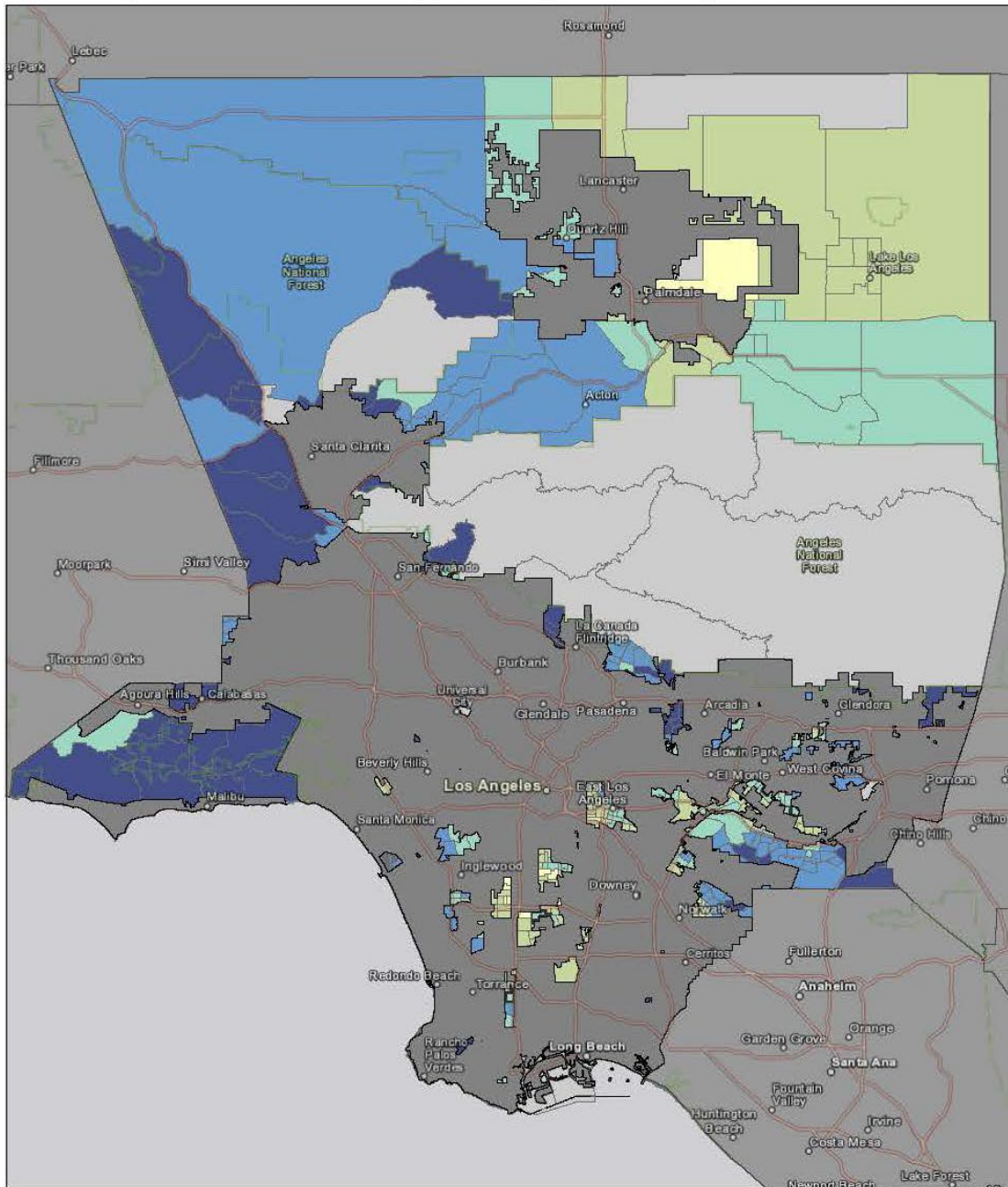


Figure E-11: TCAC Opportunity Scores by Census Tract

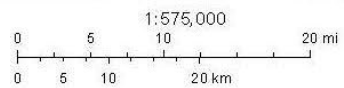


7/13/2021, 3:30:45 PM

- 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



Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community
Esri, HERE, Garmin, USGS, EPA, NPS

iii. Who are your key stakeholders? How are you engaging them? (5 points)

The proposed activities are committed actions from the General Plan and Housing Element, which were developed in partnership with a diversity of stakeholders, and with input received from hundreds of meetings and community engagement activities. Key stakeholders include residents; business owners; employees; community leaders and stewards; environmental groups; community-based organizations; community organizers; town councils; transit and bicycle advocates; economic development corporations; trade associations; organized labor; people experiencing homelessness; people with disabilities; homeowners associations; renters; state, local and regional agencies; cities; developers/building industry representatives; chambers of commerce and business federations; legal aid; environmental justice advocates, and other County agencies and departments.

The County will continue to reach out to stakeholders throughout the grant period. In addition to working with organizations, holding events and community meetings (in person and virtual), and other traditional forms of engagement, the County will focus on its “ground game” through direct outreach to stakeholders at schools, parks, senior centers, churches and other faith-based locations, supermarkets and community gathering places, pre-scheduled events, and “office hours” like walk-and-talks held within the community. The County will also establish formal relationships with community-based organizations (CBOs). LA County Planning will use a pre-approved master agreement established by the Department of Public Health to quickly onboard and compensate CBOs that have established trust within communities and the ability to organize people; use alternative means to disseminate information, such as door to door engagement; and can provide invaluable insight into how stakeholders get their information and stay informed (eg., community message board, radio, online, text, word of mouth, regularly scheduled meeting, etc.). The County will also use project web pages to document the process and promote transparency. Furthermore, LA County Planning will implement its robust language access policy to proactively provide translation and interpretation, based on documented need using GIS and census tract information.

The proposed activities are committed actions from the General Plan and Housing Element, which were developed in partnership with a diversity of stakeholders, and with input received from hundreds of meetings and community engagement activities. Specific to this application, LA County Planning made a public presentation at a regularly scheduled Countywide Community Services meeting (virtually) on September 27, 2023, wherein staff discussed the draft application. The County made the draft application available for public review on October 6, 2023, and the Board of Supervisors held a public hearing on October 24, 2023. This public hearing was held in a hybrid (in-person and virtual) format that provides language access options and accessibility accommodations. The County also developed a dedicated accessible web page, with language translation features, for the application at <https://planning.lacounty.gov/long-range-planning/pro-housing/>; posted newspaper ads in English and Spanish; posted announcements on social media in English and Spanish; and sent email blasts in English and Spanish to 4,957 email addresses using the Department’s courtesy contact list, which comprise contacts for community leaders, community-based organizations, building industry representatives, and other housing industry stakeholders engaged in housing policy issues. Additionally, the County’s sister agency, the Los

Angeles Community Development Agency (LACDA), a HUD grantee, distributed notices of the application's availability through its contact lists. The County made available bilingual Spanish-speaking and Mandarin Chinese-speaking staff and other language access tools to answer questions and collect public comments on the draft application.

The proposed activities are committed actions from the General Plan and Housing Element, which were developed in partnership with a diversity of stakeholders, and with input received from hundreds of meetings and community engagement activities. Some of the stakeholder input that informed the proposal includes documented comments from the County's recent update to its Housing Element. Several stakeholders expressed concerns over the impacts of upzoning parcels to accommodate higher residential densities without considerations for potential displacement and gentrification, infrastructure capacity, increased traffic, and missed opportunities to capture community benefits. Other comments and recommendations from the Housing Element Update process include concerns over the loss of commercial uses to residential uses, a need for more missing middle housing types, a need for more affordable housing, and frustration over approach to community engagement. The proposed activities combined will address all of these issues.

To encourage participation, the County will use traditional forms of outreach as well as direct outreach to stakeholders at schools, parks, churches, supermarkets, gathering places, events, and "office hours" held within the community. The County will also establish formal relationships with community-based organizations (CBOs) to ensure that all voices are represented and heard throughout the development of the proposed activities. This direct and proactive outreach, and the use of different approaches, will ensure that the County engages those who are most likely to benefit from the proposed activities. The County will engage with stakeholders early and often, which will help build trust and a better understanding of the proposed policies. Also, creating more opportunities for stakeholders to inform and shape the policies can help obtain community buy-in.

iv. How does your proposal align with requirements to affirmatively further fair housing? (5 points)

The proposed activities for **Equity/Fair Housing** will remove barriers to the development of affordable housing in well-resourced areas of opportunity by allowing missing middle housing types in traditionally single-family neighborhoods in High and Highest Resource tracts. BIPOC communities are expected to benefit from the proposed activities.

The proposal includes four unincorporated areas with R/ECAP census tracts:

- West Athens-Westmont (2)(Metro Planning Area)
- Florence-Firestone (Metro Planning Area)
- Lennox (South Bay Planning Area)
- West Los Angeles (Sawtelle VA) (Westside Planning Area)
- Willowbrook (Metro Planning Area)

The Hispanic/Latino population makes up the majority in the West Athens-Westmont, Florence-Firestone, Lennox, and Willowbrook R/ECAP tracts. In the West Los Angeles (Sawtelle VA)

R/ECAP tract, 36.8 percent of the population is White, 26.5 percent of the population is Hispanic/Latino, and 22.4 percent of the population is Black.

Communities where racial/ethnic minorities are the predominant population are generally located in the southern, southeastern, and northeastern areas of Los Angeles County. The following unincorporated areas have the largest non-White majority populations in the areas address by the proposed activities:

- Lennox (South Bay), Florence-Firestone (Metro), Walnut Park (Metro), Willowbrook (Metro), East Rancho Dominguez (Metro), East Los Angeles (Metro), West Whittier-Los Nietos (Gateway), South Whittier-Sunshine Acres (Gateway), Avocado Heights (East San Gabriel Valley), West Puente Valley (East San Gabriel Valley), Valinda (East San Gabriel Valley), South San Jose Hills (East San Gabriel Valley) have Hispanic/Latino majority populations.
- View Park-Windsor Hills (Westside) and West Athens-Westmont (Metro) have Black majority populations.
- Hacienda Heights (East San Gabriel Valley) and Rowland Heights (East San Gabriel Valley) have Asian majority populations.

As previously discussed, past systemic racism and discriminatory housing practices by government agencies such as the use redlining maps and restrictive housing covenants, have not only resulted in long-term inequality, but have shaped the physical environment and significantly influenced the residential land use patterns that we know today. These are some of the policies and practices that have caused segregation and maintaining these land use patterns perpetuates the legacy of these policies and practices. For example, over 70% of residential land in unincorporated Los Angeles County are zoned for single-family residences. While many past practices of systemic racism have been eliminated, they may still manifest in less overt ways, such as racist definitions and exclusionary policies in zoning codes. Removing barriers and affirmatively furthering fair housing are important strategies to reversing land use patterns and unraveling the legacy of past systemic racism and combatting the systemic racist policies that persist today.

The County will ensure that the proposal will not cause affordable housing to be further concentrated in low-opportunity areas or in areas that already have ample affordable housing through the Missing Middle and Gentle Density Housing Program, which will focus on creating housing opportunities in higher resource areas. Also, the area plans that will serve as the basis for the CIPs are guided by the Housing Element affirmatively furthering fair housing analysis, which is how the County can ensure that affordable housing will not be further concentrated in low opportunity areas.

The proposed activities will work in conjunction with the County's existing policies to address the unique housing needs of members of protected class groups, families with children, and underserved communities of color. The Equity Audit will focus on identifying and removing barriers to fair housing and affirmatively furthering fair housing to increase housing choice.

The proposed activities come from the General Plan and Housing Element, which were prepared in conjunction with the 2018 Analysis of Impediments to Fair Housing Choice prepared by the Los Angeles County Development Authority for the Urban County.

The risk of displacement will be directly addressed with policies in the proposed activities and work in conjunction with existing policies. There are existing anti-displacement policies, such as replacement and right of first refusal in the Affordable Housing Preservation Ordinance, and relocation assistance and tenant protections in the Rent Stabilization Ordinance. The proposed activities will build off the existing policies to strengthen them to ensure that they do not lead to the displacement of vulnerable residents in communities of color.

The proposed activities will work in conjunction with existing County policies to address the housing needs of people with disabilities and increase their access to accessible affordable housing, including the Reasonable Accommodations Ordinance. The Equity Audit will also focus on identifying and removing barriers to fair housing and affirmatively furthering fair housing to increase housing choice. The County will work with Los Angeles County Development Authority's goals to enhance accessible housing, supportive services, and transit to persons with disabilities to ensure compliance with the Americans with Disabilities Act. The County will also ensure compliance for meetings, hearings, and community engagement events.

The County will focus on extensive environmental analysis and a robust community engagement process to address resistance to the proposed activities. Recognizing that missing middle housing and increases in density are controversial and divisive issues, the County will provide meaningful, extensive, and inclusive engagement opportunities to ensure that all voices are heard.

The equity-related educational resources, tools, and public input that have informed the County's proposal comes from the Government Alliance on Race and Equality (GARE), of which the County is a member, and other racial equity resources and trainings that have been offered through the County's ARDI initiative. The County's Equity Indicators Tool, Environmental Justice Screening Tool, and Equity Explorer have informed the development of the proposal, as well as the State of California CalEnviroScreen 4.0 and the State of California CTCAC/HCD Opportunity Area Maps.

The County's proposal works in conjunction with existing County policies for business preference programs encourage business owners who are minorities, women, disadvantaged or disabled veterans to capitalize on opportunities in government and private-sector procurement programs. The County ARDI Initiative will inform the County's strategic plan process and LA County Planning's strategic plan processes, both of which are currently underway and equity-focused.

Other equity considerations include noting that the number of people experiencing homelessness in Los Angeles County continues to increase, with 75, 518 people experiencing homelessness on any given night in 2023. The Los Angeles Homeless Services Authority (LAHSA) noted that Latinos made up the largest share of the homeless population, with 30,350 individuals counted, followed by Blacks with 22,606 individuals counted. Furthermore, LAHSA found that in 2017, Black people represented only 9% of the general population in Los Angeles County but comprised 40% of the population experiencing homelessness. While the proposed activities do not directly

address these disturbing trends, land use and zoning has always been a part of the County's Homeless Initiative strategies to remove barriers and increasing the production and preservation of affordable housing to combat homelessness.

The County will track the progress and evaluate the effectiveness of the proposed activities to advance racial equity by collecting qualitative data as available from Los Angeles County Development Authority and other agencies. Using GIS equity mapping tools, the County can track the effectiveness of these programs over time. The County can also use surveys and community engagement to garner feedback and collect qualitative data from the community.

v. *What are your budget and timeline proposals? (5 points)*

As shown in the *HUD-424CBW Grant Application Detailed Budget Worksheet*, the County seeks \$8.3 million to fund consultant work for planning, engineering, and environmental review, and \$1.7 million for CBO contracts for community engagement, for a total of \$10 million. The budget for each activity has been determined based on the geographic scale of each planning area, in addition to previous experience with budgets for area plans and environmental analyses (California Environmental Quality Act) for the planning areas. The budget for the Missing Middle and Gentle Density Housing Program was determined based on the likely need for a comprehensive environmental analysis, given the focus on potential increased densities in single family neighborhoods, and the need for comprehensive outreach. The budget for the Equity Audit assumes zoning code amendments to remove barriers that will most likely not require comprehensive environmental analysis. Furthermore, the rule of thumb used for determining the budget for community engagement by CBOs (as recommended by local CBOs) is \$150,000 per project and was adjusted based on scale of planning area and level of controversy over planning issues.

Note that the County has a pending proposal for \$1.5 million for the State Regional Early Action Planning Grant (REAP 2.0), administered locally by the South California Association of Governments, for the development of a regional sewer area model for communities in the Gateway Planning Area and Metro Planning Area. Because it is pending, it is not listed in Exhibit F Leverage; however, as the grant is non-competitive, it has been accounted for in the budget estimates for the County's PRO Housing proposal to avoid funding and scope overlap.

Budget: Consultants		
	Estimated Cost	HUD Share
Planning, Engineering, Environmental Review/East San Gabriel Valley Planning Area CIP	\$1,200,000	\$1,200,000
Planning, Engineering, Environmental Review/Gateway Area Plan and CIP	\$1,000,000	\$1,000,000
Planning, Engineering, Environmental Review/Metro Planning Area CIP	\$1,000,000	\$1,000,000
Planning, Engineering, Environmental Review/South Bay Planning Area CIP	\$900,000	\$900,000
Planning, Engineering, Environmental Review/West San Gabriel Valley Planning Area CIP	\$1,200,000	\$1,200,000
Planning, Engineering, Environmental Review/Westside Planning Area CIP	\$800,000	\$800,000
Planning, Environmental Review/East Los Angeles TOD Specific Plan Update	\$700,000	\$700,000
Planning, Environmental Review/East Pasadena-East San Gabriel TOD Specific Plan	\$700,000	\$700,000
Planning, Environmental Review/Missing Middle and Gentle Density Housing Program	\$600,000	\$600,000
Planning, Environmental Review/Equity Audit	\$200,000	\$200,000
Total	\$8,300,000	\$8,300,000
Budget: Contracts		
	Estimated Cost	HUD Share
CBO for Community Engagement/East San Gabriel Valley Planning Area CIP	\$250,000	\$250,000
CBO for Community Engagement/Gateway Area Plan and CIP	\$150,000	\$150,000
CBO for Community Engagement/Metro Planning Area CIP	\$150,000	\$150,000
CBO for Community Engagement/South Bay Planning Area CIP	\$200,000	\$200,000
CBO for Community Engagement/West San Gabriel Valley Planning Area CIP	\$250,000	\$250,000
CBO for Community Engagement /Westside Planning Area CIP	\$200,000	\$200,000
CBO for Community Engagement/East Los Angeles TOD Specific Plan Update	\$100,000	\$100,000
CBO for Community Engagement/East Pasadena-East San Gabriel TOD Specific Plan	\$100,000	\$100,000
CBO for Community Engagement/Missing Middle and Gentle Density Housing Program	\$200,000	\$200,000
CBO for Community Engagement/Equity Audit	\$100,000	\$100,000
Total	\$1,700,000	\$1,700,000

If HUD awards an amount less than requested, the County will pursue alternative funding sources, including County general funds, or other grant opportunities. If necessary, the County could forego the \$1.7 million proposed for community engagement by CBOs, and conduct community engagement for the activities in house. Therefore, a minimum of \$8.3 million is needed in order to complete and successfully carry out the proposal. Should HUD grant 50% of the requested amount, the County would delay the following projects, until alternative funding sources are identified: Gateway Area Plan and Gateway Planning Area CIP, West San Gabriel Valley Planning Area CIP, Westside Planning Area CIP, East Los Angeles TOD Specific Plan Update, and East Pasadena-East San Gabriel Valley TOD Specific Plan.

The schedule for the proposal provides an overview of the start and completion dates for each activity, along with major milestones/tasks. The schedule assumes ongoing community engagement throughout the development of the project and during the public hearing process. The schedule is based on staffing and availability of data. The schedule for proposed activities, milestones, and sub-tasks are shown in the following table:

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Project Schedule					
	Start	Project Development/ Environmental Review	Regional Planning Commission Hearing	Board of Supervisors Hearing	Completion
	Community Engagement				
Infrastructure Planning					
Metro Planning Area CIP	2/2024	6/2027	8/2027	11/2027	1/2027
East San Gabriel Valley Planning Area CIP	2/2024	6/2027	8/2027	11/2027	1/2027
Gateway Area Plan and Gateway Planning Area CIP	1/2025	11/2028	1/2029	4/2029	6/2029
South Bay Planning Area CIP	1/2025	6/2028	8/2028	11/2028	12/2028
Westside Planning Area CIP	1/2025	6/2028	8/2028	11/2028	12/2028
West San Gabriel Valley Planning Area CIP	1/2025	6/2028	8/2028	11/2028	12/2028
Transit Oriented Districts					
East Los Angeles TOD Specific Plan Update	1/2025	6/2028	8/2028	11/2028	12/2028
East Pasadena-East San Gabriel TOD Specific Plan	1/2025	6/2028	8/2028	11/2028	12/2028
Equity/Fair Housing					
Missing Middle and Gentle Density Housing Program	1/2027	11/2028	1/2029	4/2029	6/2029
Equity Audit	1/2027	11/2028	1/2029	4/2029	6/2029

EXHIBIT E Capacity

County of Los Angeles

DRAFT

c. CAPACITY (Maximum 10 points)

i. What capacity do you and your Partner(s) have? What is your staffing plan? (10 points)

The County of Los Angeles is not unfamiliar with managing large, complex grants and has the depth and experience to meet all grant obligations. Specifically, the County's Department of Regional Planning (also known as LA County Planning) will be the lead internal agency for implementation of the grant. LA County Planning has demonstrated experience managing large, complex grants and has received over \$7 million in grant funds over the past four years from various sources, including the State of California, Southern California Association of Governments, and the LA Metro transit agency. All the grants were for long range planning studies, transit-oriented development, General Plan amendments, and zoning code amendments, and all grants were successfully completed on time and within budget.

For this grant, LA County Planning will partner with the Department of Public Works (PW), to complete the necessary CIP programs. LA County Planning has a pre-existing Memorandum of Understanding with PW that sets forth the obligations of each department when working on joint projects. LA County Planning will utilize existing resources in the Department of Public Health and the Chief Sustainability Office to assist with outreach and to ensure enhanced language access and capacity.

As a full-service planning department with experience implementing grant-funded programs, LA County Planning has the relevant project management, quality assurance, financial and procurement, and internal control capacity to quickly launch and implement major projects. LA County Planning will rely on three divisions within its organizational structure: Advance Planning, Current Planning, and Information & Fiscal Services. The Advance Planning Division will act as the program lead responsible for overall program management and development of CIPs and zoning code amendments. Comprised of approximately 30 professional staff, they regularly perform project management on highly complex land use projects. Quality control and quality assurance occurs throughout various stages of a project's development and includes detailed management reviews at key milestones. Advance Planning staff regularly write and amend zoning ordinances. The Current Planning Division, comprising approximately 60 professional and technical staff, provides expertise in applying zoning code solutions to pending applications. Current Planning will act as a general resource to Advance Planning and will augment the proposed community engagement and outreach programs. The Information and Fiscal Services Division currently manages all financial and procurement processes under general policies set by the County's internal service providers. They will be responsible for contracting, accounting, compliance, and internal auditing to ensure compliance with grant requirements. If necessary, LA County Planning will utilize existing resources for grant compliance from other departments, including its sister agency, Los Angeles County Development Authority.

As stated earlier, LA County Planning maintains an existing MOU with PW for review and implementation of transportation programs and plans. This MOU will be amended to account for

the requirements of this grant. LA County Planning will rely on the professional expertise of transportation planners and engineers in PW, while maintaining overall project management responsibilities. If additional capacity is needed, PW has a master list of pre-qualified professional consulting firms from small, medium, and large transportation and engineering firms that are also qualified for prevailing wage and/or David-Bacon compliance.

Planning and land use functions are governed by Title 7 Division 1 of the State of California Government Code. California Government Code 65300 requires each jurisdiction to prepare comprehensive plans and authorizes jurisdictions to adopt zoning codes. For unincorporated Los Angeles County, the Board of Supervisors established the Regional Planning Commission in 1923 in accordance with California Government Code Section 65101. Preparation of comprehensive plans and zoning code ordinances lies with LA County Planning. These plans and ordinances are reviewed by the Regional Planning Commission and approved by the Board of Supervisors prior to taking effect. Similarly, the Regional Planning Commission can adopt capital improvement plans, bicycle masterplans, pedestrian plans, and other specialty plans through the same process. Simply put, LA County Planning, through its existing functions, has the legal authority to effectively implement all of the proposed activities.

LA County Planning regularly contracts with professional consultants and technical experts in land use and environmental clearance (CEQA and NEPA). It acts as Lead Agency under CEQA for development projects and has partners with other County departments on projects that require compliance with NEPA. LA County Planning is currently establishing contracts with community-based organizations to act as fiscal agents for smaller organizations for enhanced outreach and engagement as part of this grant. LA County Planning is also a long term subrecipient of CDBG funds for code enforcement activities through existing LACDA/County CDBG programs, and is required to report compliance with the County's Consolidated Plan and annual Action Plans for HUD.

LA County Planning wrote this grant application exclusively, without the use of professional or technical consultants or grant writers. Primary authors included Amy Bodek, Director of Regional Planning, Connie Chung, Deputy Director for Advance Planning, and Edward Rojas, Assistant Deputy Director for Advance Planning. Technical assistance for budgeting was provided by internal staff including Karen Chin, Budget Manager, and Joseph Horvath, Information & Fiscal Services Deputy Director. Maps and demographic information were provided by internal staff in the GIS section.

The Department has experience working with civil rights and fair housing issues on a regular basis. The Department also has experience with the design or operations of programs that have provided tangible reductions in racial disparities. Below is an organizational chart of all full-time staff who will be working with consultant teams and CBOSs on the proposed PRO Housing activities. Staff will be responsible for project management, supplemental analyses, managing the projects through the public hearing process, and community engagement.

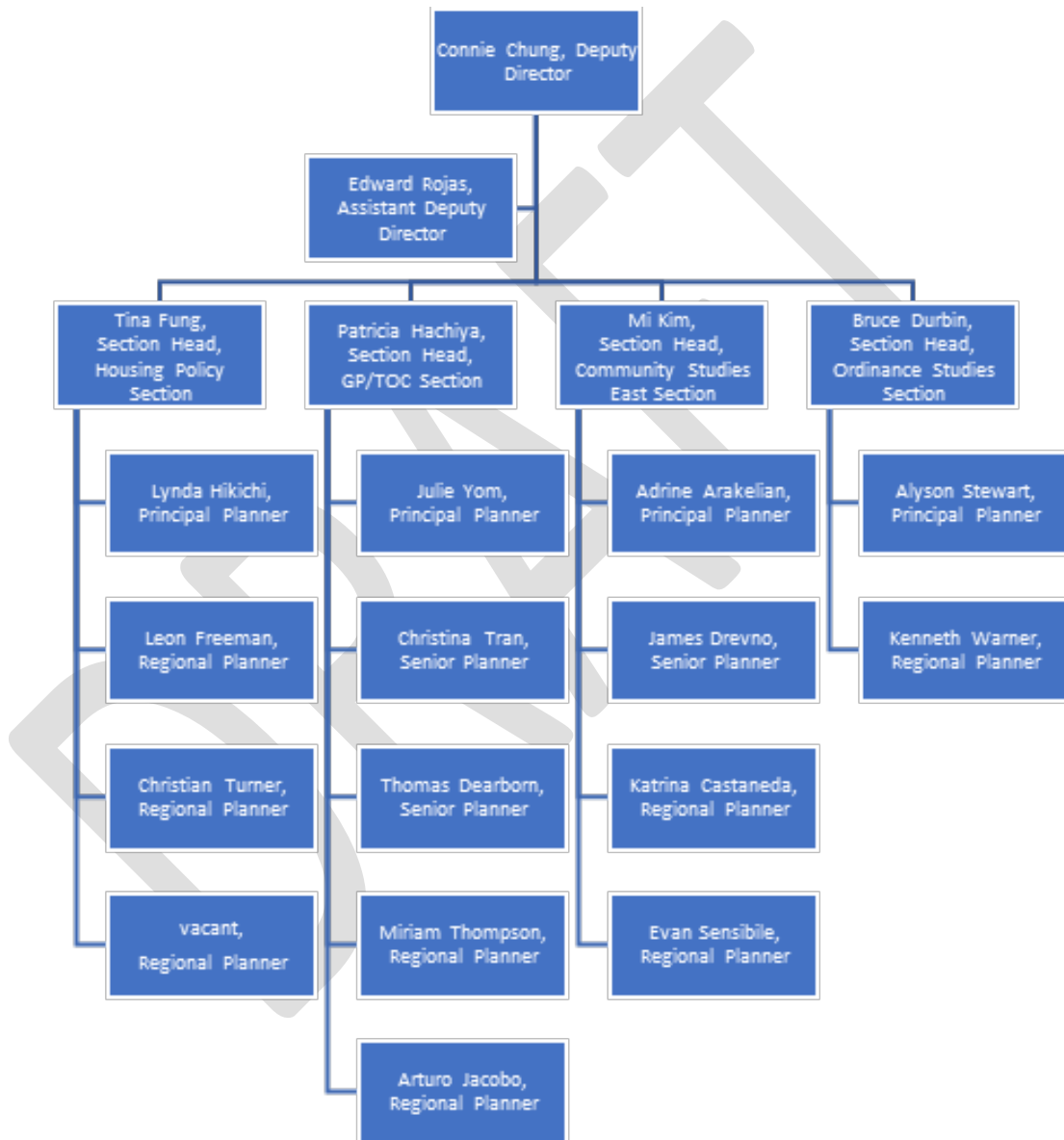


EXHIBIT F Leverage

County of Los Angeles

DRAFT

i. Are you leveraging other funding or non-financial contributions? (10 points)

LA County Planning will be the project lead for this effort on behalf of the County. LA County Planning is firmly committed to dedicating at least 49,911 hours, or \$10,592,791 in staff time in kind to support project management, facilitate community engagement, coordinate with other agencies, and provide mapping, analyses, and other technical and administrative tasks as needed to ensure the completion of projects. See attached letter.

DRAFT

EXHIBIT G Long-Term Effect

County of Los Angeles

DRAFT

e. LONG-TERM EFFECT (Maximum 10 points)

i. What permanent, long-term effects will your proposal have? What outcomes do you expect? (10 points)

Upon completion of the grant-funded activities, the County will have developed CIPs for the East San Gabriel Valley Planning Area, Gateway Planning Area, Metro Planning Area, South Bay Planning Area, West San Gabriel Valley Planning Area, and Westside Planning Area Gateway Planning Area; and an area plan for the Gateway Planning Area. Also, the County will have developed two TOD specific plans for East Los Angeles and East Pasadena-East San Gabriel. Furthermore, the County will have removed barriers and made amendments to the General Plan and Zoning Code to affirmatively further fair housing and ensure that policies are equitable. By the end of the grant period, all proposed activities will have undergone a comprehensive public process and will have been approved and adopted by County Regional Planning Commission and County Board of Supervisors. The proposed actions will shape future implementing actions, and in doing so, will permanently produce and preserve affordable housing beyond the grant period.

Major roadblocks are the uncertainty, and potential changes or delays that can occur to the proposed activities during the public hearings due to opposition. The best way to counteract these roadblocks is to ensure that the community engagement process is extensive, and to obtain buy in from stakeholders, which is accounted for in the proposal. In addition, the County will ensure that accurate information on the proposed activities is available in an inclusive and comprehensive way.

The proposed activities will not only produce and preserve affordable housing, but coordinate the housing with infrastructure, land use planning, and creating access to transit, amenities, public services, jobs, schools, and other important community assets and locations. The proposed activities for Infrastructure Planning and Transit-Oriented Districts will directly create access, amenities, and community assets for LMI households, while the proposed activities for Equity/Fair Housing will increase affordable housing opportunities in High and Highest Resource areas, which have greater access to such services and amenities.

Because the unincorporated areas are diverse and span across Los Angeles County, in between 88 cities, the proposed activities can provide comparable local examples and resources for other jurisdictions to replicate and scale. The County selected proposed activities that have been tried and tested by other jurisdictions and in some cases, by the County. The County's successful completion and implementation of the proposed activities can add to the country's knowledgebase that these solutions, while challenging, are not insurmountable to establish, and that they do effectively produce and preserve affordable housing.

The unincorporated areas most significant environmental risks are wildfires, flooding, and seismic areas, which are becoming worse due to the effects of climate change. The proposal is in alignment and consistent with the Safety Element and Climate Action Plan, which are also components of the General Plan, and informed by the County's Climate Vulnerability Assessment, which

identifies specific risks for Los Angeles County and analyzes impacts, particularly on frontline communities. The Safety Element and Climate Action Plans addresses these environmental risks as well as policies that promote community resilience to mitigate the impacts of climate change. For example, the rezoning program does not include parcels that are within Very High Fire Hazard Severity Zones. The forthcoming Climate Action Plan Update ensures that the benefits of measures and implementing actions are prioritized for frontline communities.

Success at the end of the period of performance and beyond will be having adopted policies in the General Plan and Zoning Code that address the Needs identified in this proposal by producing and preserving affordable housing, streamlining the housing development process with the removal of barriers, creating livable communities, and reversing legacy racist land use patterns that contribute to the housing crisis. The following metrics will measure these successful outcomes:

Metrics:

- Number of by-right affordable housing units produced/preserved: 53,519 affordable units (25,648 units affordable to households with incomes at 50% AMI and below; 13,691 units affordable to households with incomes at 80% AMI and below; and 14,180 units affordable to households with incomes at 120% AMI and below).
- Number of total by-right housing units produced: 90,052 units
- Percentage of the total number of 100% affordable housing developments that are produced in High and Highest Resource tracts: at least 50%
- Percentage of the total number of 100% affordable housing developments that are produced in High Segregation and Poverty, Low Resource, and R/ECAP tracts: 0%
- Percentage of infrastructure identified in CIPs implemented: 75%
- Percentage of by-right units produced in TODs/High Quality Transit Area: 75%

All proposed activities will be guided by the County's equity goals and goals to affirmatively further fair housing. The Missing Middle and Gentle Density Housing Program and the Equity Audit will directly work toward removing barriers to reverse land use patterns that have resulted in exclusionary practices and policies rooted in systemic racism. The proposed activities in Infrastructure Planning and Transit Oriented Districts will not only increase the production and preservation of affordable housing but provide the necessary ingredients to build communities and improve quality of life for LMI households.

ATTACHMENTS/FORMS

County of Los Angeles

DRAFT

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

Completed by Grants.gov upon submission.

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Amy J. Bodek

* b. Employer/Taxpayer Identification Number (EIN/TIN):

95-6000927

* c. UEI:

KJ8WTJMLKRQ7

d. Address:

* Street1:

320 West Temple Street, 13th Floor

Street2:

* City:

Los Angeles

County/Parish:

LA

* State:

CA

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

90012

e. Organizational Unit:

Department Name:

County of Los Angeles Department Regional Planning

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Connie

Middle Name:

* Last Name:

Chung

Suffix:

Title:

Deputy Director

Organizational Affiliation:

* Telephone Number:

213-893-7038

Fax Number:

* Email:

cchung@planning.lacounty.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

County government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Community Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

FR-6700-N-98

* Title:

Pathways to Removing Obstacles to Housing (PRO Housing)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

County of Los Angeles Proposal for the HUD Pathways to Removing Obstacles to Housing (PRO Housing) Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant **Same as Project**

* b. Program/Project **See attached**

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: **2/2024**

* b. End Date: **6/2029**

18. Estimated Funding (\$):

* a. Federal	\$10,000,000
* b. Applicant	\$10,592,791
* c. State	N/A
* d. Local	N/A
* e. Other	N/A
* f. Program Income	N/A
* g. TOTAL	

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on **10/6/23**.

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

**** I AGREE**

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name: **Amy**

Middle Name: **J.**

* Last Name: **Bodek**

Suffix:

* Title: **Director**

* Telephone Number: **213-974-6401** Fax Number:

* Email: **abodek@planning.lacounty.gov**

* Signature of Authorized Representative: Completed by Grants.gov upon submission.

* Date Signed: Completed by Grants.gov upon submission.

Application for Federal Assistance SF-424

Attachment

16. Congressional Districts Of (applicant/program/project):

23rd

26th

27th

28th

29th

30th

31st

32nd

34th

35th

36th

37th

38th

42nd

43rd

44th

Grant Application Detailed Budget Worksheet

OMB Approval No. 2501-0017
Expiration: 1/31/2026

Applicant Name: County of Los Angeles												
Subtotal - Transportation - Airfare												
3c. Transportation - Other												
Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
Subtotal - Transportation - Other												
3d. Per Diem or Subsistence (indicate location)												
Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
Subtotal - Per Diem or Subsistence												
Total Travel Cost												
4. Equipment (Only items over \$5,000 Depreciated value)												
Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
Total Equipment Cost												
5. Supplies and Materials (Items under \$5,000 Depreciated Value)												
5a. Consumable Supplies												
Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
Subtotal - Consumable Supplies												
5b. Non-Consumable Materials												
Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
Subtotal - Non-Consumable Materials												
Total Supplies and Materials Cost												
6. Consultants (Type)												
Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
Planning, Engineering, Environmental Review/East San Gabriel Valley Planning Area CIP		\$1,200,000	\$1,200,000									
Planning, Engineering, Environmental Review/Gateway Area Plan and CIP		\$1,000,000	\$1,000,000									
Planning, Engineering, Environmental Review/Metro Planning Area CIP		\$1,000,000	\$1,000,000									
Planning, Engineering, Environmental Review/South Bay Planning Area CIP		\$900,000	\$900,000									
Planning, Engineering, Environmental Review/West San Gabriel Valley Planning Area CIP		\$1,200,000	\$1,200,000									
Planning, Engineering, Environmental Review/Westside Planning Area CIP		\$800,000	\$800,000									
Planning, Environmental Review/East Los Angeles TOD Specific Plan Update		\$700,000	\$700,000									
Planning, Environmental Review/East Pasadena-East San Gabriel TOD Specific Plan		\$700,000	\$700,000									
Planning, Environmental Review/Missing Middle and Gentle Density Housing Program		\$600,000	\$600,000									
Planning, Environmental Review/Equity Audit		\$200,000	\$200,000									
Total Consultants Cost		\$8,300,000	\$8,300,000									
7. Contracts and Sub-Grantees (List individually)												
7a. Contracts												
Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income		
CBO for Community Engagement/East San Gabriel Valley Planning Area CIP		\$250,000	\$250,000									
CBO for Community Engagement/Gateway Area Plan and CIP		\$150,000	\$150,000									
CBO for Community Engagement/Metro Planning Area CIP		\$150,000	\$150,000									
CBO for Community Engagement/South Bay Planning Area CIP	2	\$200,000	\$200,000									

Grant Application Detailed Budget Worksheet

OMB Approval No. 2501-0017
Expiration: 1/31/2026

Applicant Name: County of Los Angeles												
CBO for Community Engagement/West San Gabriel Valley Planning Area CIP			\$250,000		\$250,000							
CBO for Community Engagement/Westside Planning Area CIP			\$200,000		\$200,000							
CBO for Community Engagement/East Los Angeles TOD Specific Plan Update			\$100,000		\$100,000							
CBO for Community Engagement/East Pasadena-East San Gabriel TOD Specific Plan			\$100,000		\$100,000							
CBO for Community Engagement/Missing Middle and Gentle Density Housing Program			\$200,000		\$200,000							
CBO for Community Engagement/Equity Audit			\$100,000		\$100,000							
Subtotal - Contracts			\$1,700,000		\$1,700,000							
7b. Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Sub-Grantees												
Total Contracts and Sub-Grantees Cost			\$1,700,000		\$1,700,000							
8. Construction Costs												
8a. Administrative and legal expenses	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Administrative and legal expenses												
8b. Land, structures, rights-of way, appraisal, etc	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Land, structures, rights-of way, ...												
8c. Relocation expenses and payments	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Relocation expenses and payments												
8d. Architectural and engineering fees	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Architectural and engineering fees												
8e. Other architectural and engineering fees	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Other architectural and engineering fees												
8f. Project inspection fees	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Project inspection fees												
8g. Site work	Quantity	Unit Cost	Estimated Cost		HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Site work												

Grant Application Detailed Budget Worksheet

OMB Approval No. 2501-0017
Expiration: 1/31/2026

Applicant Name:		County of Los Angeles										
Regional Planner	106.05%	\$134,114	\$142,229			\$142,229						
Regional Planner	106.05%	\$192,728	\$204,390			\$204,390						
Regional Planner	106.05%	\$289,181	\$306,679			\$306,679						
Regional Planner	106.05%	\$226,323	\$240,018			\$240,018						
Regional Planner	106.05%	\$289,181	\$306,679			\$306,679						
Total Indirect Costs		\$5,221,088	\$5,371,703			\$5,371,703						
Total Estimated Costs			\$20,592,791		\$10,000,000	\$10,592,791						

Grant Application Detailed Budget Worksheet	OMB Approval No. 2501-0017 Expiration: 1/31/2026
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Detailed Description of Budget		
Analysis of Total Estimated Costs	Estimated Cost	Percent of Total
1 Personnel (Direct Labor)	3,131,801.19	15.2%
2 Fringe Benefits	2,089,287.21	10.1%
3 Travel	0.00	0.0%
4 Equipment	0.00	0.0%
5 Supplies and Materials	0.00	0.0%
6 Consultants	8,300,000.00	40.3%
7 Contracts and Sub-Grantees	1,700,000.00	8.3%
8 Construction	0.00	0.0%
9 Other Direct Costs	0.00	0.0%
10 Indirect Costs	5,371,702.53	26.1%
Total:	20,592,790.93	100.0%
Federal Share:	10,000,000.00	48.6%
Match (Expressed as a percentage of the Federal Share):	10,592,790.93	51.4%

October 6, 2023

To Whom It May Concern:

**PATHWAYS TO REMOVING OBSTACLES TO HOUSING (PRO HOUSING)
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

On behalf of the County of Los Angeles Department of Regional Planning (Department), the Department will be the project lead for this effort. The Department is firmly committed to dedicating at least 49,911 hours, or \$10,592,791 in staff time for in-kind support for the project. The staff support will include project management, facilitation of community engagement, coordination with other agencies, and providing mapping, analyses, and other technical and administrative tasks as needed to ensure the completion of County's proposal.

As Director of the Department, I have the authority to make such a commitment. Thank you for your consideration.

Sincerely,



AMY J. BODEK, AICP
Director of Regional Planning

AJB:lg

Attachments

S_EO_10_00_2023_L_ProHousing

SHAPING
TOMORROW

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* APPLICANT'S ORGANIZATION

County of Los Angeles Department of Regional Planning

* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

Prefix: * First Name: Middle Name:

* Last Name: Suffix:

* Title:

* SIGNATURE:

* DATE:

**Applicant and Recipient
Assurances and Certifications**

**U.S. Department of Housing
and Urban Development**

OMB Number: 2501-0017
Expiration Date: 01/31/2026

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized Representative Name:

Prefix: *First Name:
Middle Name:
*Last Name:
Suffix:

*Title:

*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.
2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).
3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion sex (including gender identity and sexual orientation), disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

- is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.
 6. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.
 7. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.
 8. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

*Signature:

Completed Upon Submission to Grants.gov

*Date:

Completed Upon Submission to
Grants.gov

Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing and Urban Development

OMB Number: 2501-0017
Expiration Date: 01/31/2026

Applicant/Recipient Information

* UEI Number:

KJ8WTJMLKRQ7

* Report Type:

INITIAL

1. Applicant/Recipient Name, Address, and Phone (include area code):

* Applicant Name: Amy J. Bodek

* Street1: 320 West Temple Street

Street2:

* City: Los Angeles

County: LA

* State: CA

* Zip Code: 90012

* Country: USA

* Phone: 213-974-6401

2. Employer ID Number (do not include individual social security numbers): 95-6000927

* 3. HUD Program Name:

HUD Pathways to Remove Obstacles to Housing (PRO Housing) Grant FR-6700-N-98

* 4. Amount of HUD Assistance Requested/Received: \$ \$10,000,000

5. State the name and location (street address, City and State) of the project or activity:

* Project Name: County of Los Angeles Proposal for the HUD Pathways to Remove Obstacles to Housing (PRO Housing) Grant

* Street1: 320 West Temple Street

Street2:

* City: Los Angeles

County: LA

* State: CA

* Zip Code: 90012

* Country: USA

Part I Threshold Determinations

* 1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. For further information see 24 CFR Sec. 4.3.

* 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR 4.9.

Yes

No

If you answered "No" to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form. However, you must sign the certification at the end of the report.

Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name:

* Government Agency Name:

Government Agency Address:

* Street1:

Street2:

* City:

County:

* State:

* Zip Code:

* Country:

* Type of Assistance:

* Amount Requested/Provided: \$

* Expected Uses of the Funds:

Department/State/Local Agency Name:

* Government Agency Name:

Government Agency Address:

* Street1:

Street2:

* City:

County:

* State:

* Zip Code:

* Country:

* Type of Assistance:

* Amount Requested/Provided: \$

* Expected Uses of the Funds:

Note: Use additional pages if necessary.

Part III Interested Parties. You must disclose:

1. All developers, contractors, or consultants involved in the application for assistance or in the planning, development, or implementation of the project or activity.

* Alphabetical list of all persons with a reportable financial interest in the project or activity (for individuals, give the last name first)

* Unique Entity ID

* Type of Participation in Project/Activity

* Financial Interest in Project/Activity (\$ and %)

	* Unique Entity ID	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

* Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)

City of Residence

* Type of Participation in Project/Activity

* Financial Interest in Project/Activity (\$ and %)

	City of Residence	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

Note: Use additional pages if necessary.

Add Attachment

Delete Attachment

View Attachment

Certification

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, correct, and accurate.

Warning: If you knowingly make a false statement on this form, you may be subject to criminal and/or civil penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed \$10,000 for each violation.

* Signature:

* Date: (mm/dd/yyyy)

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to Grants.gov

Instructions

Overview.

A. Coverage. You must complete this report if:

- (1) You are applying for assistance from HUD for a specific project or activity **and** you have received, or expect to receive, assistance from HUD in excess of \$200,000 during the fiscal year;
- (2) You are updating a prior report as discussed below; or
- (3) You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.

B. Update reports (filed by "Recipients" of HUD Assistance):

General. All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

Line-by-Line Instructions.

Applicant/Recipient Information.

All applicants for HUD competitive assistance, must complete the information required in blocks 1-5 of form HUD-2880:

1. Enter the full name, address, city, State, zip code, and telephone number (including area code) of the applicant/recipient. Where the applicant/recipient is an individual, the last name, first name, and middle initial must be entered.
2. Entry of the applicant/recipient's EIN, as appropriate, is optional. Individuals must not include social security numbers on this form.
3. Applicants enter the HUD program name under which the assistance is being requested.
4. Applicants enter the amount of HUD assistance that is being requested. Recipients enter the amount of HUD assistance that has been provided and to which the update report relates. The amounts are those stated in the application or award documentation. NOTE: In the case of assistance that is provided pursuant to contract over a period of time (such as project-based assistance under section 8 of the United States Housing Act of 1937), the amount of assistance to be reported includes all amounts that are to be provided over the term of the contract, irrespective of when they are to be received.
5. Applicants enter the name and full address of the project or activity for which the HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

Part I. Threshold Determinations - Applicants Only

Part I contains information to help the applicant determine whether the remainder of the form must be completed. Recipients filing Update Reports should not complete this Part.

If the answer to **either** questions 1 or 2 is No, the applicant need not complete Parts II and III of the report but must sign the certification at the end of the form.

Part II. Other Government Assistance and Expected Sources and Uses of Funds.

A. Other Government Assistance. This Part is to be completed by both applicants and recipients for assistance and recipients filing update reports. Applicants and recipients must report any other government assistance involved in the project or activity for which assistance is sought. Applicants and recipients must report any other government assistance involved in the project or activity. Other government assistance is defined in note 4 on the last page. For purposes of this definition, other government assistance is expected to be made available if, based on an assessment of all the circumstances involved, there are reasonable grounds to anticipate that the assistance will be forthcoming.

Both applicant and recipient disclosures must include all other government assistance involved with the HUD assistance, as well as any other government assistance that was made available before the request, but that has continuing vitality at the time of the request. Examples of this latter category include tax credits that provide for a number of years of tax benefits, and grant assistance that continues to benefit the project at the time of the assistance request.

The following information must be provided:

1. Enter the name and address, city, State, and zip code of the government agency making the assistance available.
2. State the type of other government assistance (e.g., loan, grant, loan insurance).
3. Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
4. Uses of funds. Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.

B. Non-Government Assistance. Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds - both from HUD and any other source - that have been or are to be, made available for the project or activity. Non-government sources of Form HUD-2880 funds typically include (but are not limited to) foundations and private contributors.

Part III. Interested Parties.

This Part is to be completed by both applicants and recipients filing update reports. Applicants must provide information on:

1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower). Note: A financial interest means any financial involvement in the project or activity, including (but not limited to) situations in which an individual or entity has an equity interest in the project or activity, shares in any profit on resale or any distribution of surplus cash or other assets of the project or activity, or receives compensation for any goods or services provided in connection with the project or activity. Residency of an individual in housing for which assistance is being sought is not, by itself, considered a covered financial interest.

The information required below must be provided.

1. Enter the full names and addresses. If the person is an entity, the listing must include the full name and address of the entity as well as the CEO. Please list all names alphabetically.
2. Entry of the Unique Entity Identifier (UEI), for non-individuals, or city of residence, for individuals, for each organization and person listed is **optional**.
3. Enter the type of participation in the project or activity for each person listed: i.e., the person's specific role in the project (e.g., contractor, consultant, planner, investor).
4. Enter the financial interest in the project or activity for each person listed. The interest must be expressed both as a dollar amount and as a percentage of the amount of the HUD assistance involved.

Note that if any of the source/use information required by this report has been provided elsewhere in this application package, the applicant need not repeat the information, but need only refer to the form and location to incorporate it into this report. (It is likely that some of the information required by this report has been provided on SF 424A, or on various budget forms accompanying the application.) If this report requires information beyond that provided elsewhere in the application package, the applicant must include in this report all the additional

information required. Recipients must submit an update report for any change in previously disclosed sources and uses of funds as provided in Section I.D.5., above.

Notes:

1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
2. Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).
3. See 24 CFR §4.9 for detailed guidance on how the threshold is calculated.

4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.

5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013
Expiration Date: 02/28/2025

1. * Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
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4. Name and Address of Reporting Entity:
 Prime SubAwardee

* Name

* Street 1 Street 2

* City State Zip

Congressional District, if known:

5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:

6. * Federal Department/Agency: <input type="text"/>	7. * Federal Program Name/Description: <input type="text"/>
	CFDA Number, if applicable: <input type="text"/>

8. Federal Action Number, if known: <input type="text"/>	9. Award Amount, if known: \$ <input type="text"/>
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10. a. Name and Address of Lobbying Registrant:

Prefix * First Name Middle Name

* Last Name Suffix

* Street 1 Street 2

* City State Zip

b. Individual Performing Services (including address if different from No. 10a)

Prefix * First Name Middle Name

* Last Name Suffix

* Street 1 Street 2

* City State Zip

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* Signature:

* Name: Prefix * First Name Middle Name
* Last Name Suffix

Title: Telephone No.: Date: